Analysis of Infringement of U.S. Patent No. 7,725,836 by Microchip Technology Incorporated

Plaintiffs Caddo Systems, Inc. and 511 Technologies, Inc. ("Caddo"), provide this final and exemplary infringement analysis with respect infringement of U.S. Patent No. 7,725,836 entitled "ACTIVE PATH NAVIGATION SYSTEM" (the "'836 patent") by Microchip Technology Incorporated ("Microchip"). The following chart illustrates an exemplary analysis regarding infringement by Microchip's products and services ("'836 Accused Instrumentalities"):

(i) web pages and content, including user interfaces such as a hierarchical information structure, to be interactively presented in browsers, including, without limitation, the web pages and content accessible via https://www.microchip.com/ (as shown below) including https://www.microchipdirect.com/ and maintained on servers located in and/or accessible from the United States under the control of Defendant that allow navigating within a multi-level hierarchical information structure where each level in the menu contains plural items, each said item being at least one of a function, a pointer to a location, and a pointer to another level;

(ii) software, including, without limitation, software that allows web pages and content to be interactively presented in and/or served to browsers to facilitate navigating within a multi-level hierarchical information structure where each level in the menu contains plural items, each said item being at least one of a function, a pointer to a location, and a pointer to another level; and

(iii) computer equipment, including, without limitation, computer equipment that stores, serves, hosts, supports, and/or runs any of the foregoing or that allows navigating within a multi-level hierarchical information structure where each level in the menu contains plural items, each said item being at least one of a function, a pointer to a location, and a pointer to another level, and any products, devices, systems, and/or components of systems with the same or substantially the same technical features and/or functionalities.

The analysis set forth below is based largely upon information from publicly available resources regarding the Accused Instrumentalities and Microchip's limited discovery production, as discovery in this matter has not yet been completed.

Unless otherwise noted, Caddo contends that Microchip directly infringes the '836 patent in violation of 35 U.S.C. § 271(a) by making, using, and/or selling, and/or offering to sell in the United States, and/or importing into the United States, without authority or license, the Accused Instrumentalities. The following exemplary analysis demonstrates that infringement. Unless otherwise noted,

Caddo further contends that the evidence below supports a finding of indirect infringement under 35 U.S.C. § 271(b) and 35 U.S.C. § 271(c) in conjunction with other evidence of liability.

Unless otherwise noted, Caddo believes and contends that each element of each claim asserted herein is literally met through Microchip's provision or importation of the Accused Instrumentalities. However, to the extent that Microchip attempts to allege that any asserted claim element is not literally met, Caddo believes and contends that such elements are met under the doctrine of equivalents. More specifically, in its investigation and analysis of the Accused Instrumentalities, Caddo did not identify any substantial differences between the elements of the patent claims and the corresponding features of the Accused Instrumentalities, as set forth herein. In each instance, the identified feature of the Accused Instrumentalities performs at least substantially the same function in substantially the same way to achieve substantially the same result as the corresponding claim element.

Caddo reserves the right to supplement and/or amend the positions taken in this infringement analysis, including with respect to literal infringement and infringement under the doctrine of equivalents, if and when warranted by further information obtained by Caddo, including but not limited to information adduced through information exchanges between the parties, fact discovery, expert discovery, and/or further analysis.

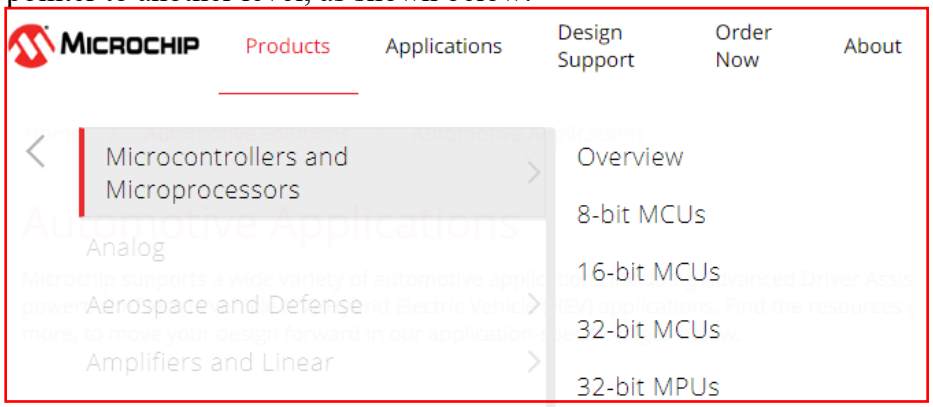
U.S. Patent No. 7,725,836 Claims	**Infringement by the Microchip '836 Accused Instrumentalities**

1. A method for navigating within a multi-level hierarchical information structure where each level in the menu contains plural items, each said item being at least one of a function, a pointer to a location, and a pointer to another level, said method comprising the steps of:	The '836 Accused Instrumentalities ("Accused Instrumentalities") include: (iv) web pages and content, including user interfaces such as a hierarchical information structure, to be interactively presented in browsers, including, without limitation, the web pages and content accessible via https://www.microchip.com/ and maintained on servers located in and/or accessible from the United States under the control of Defendant that allow navigating within a multi-level hierarchical information structure where each level in the menu contains plural items, each said item being at least one of a function, a pointer to a location, and a pointer to another level; (v) software, including, without limitation, software that allows web pages and content to be interactively presented in and/or served to browsers to facilitate navigating within a multi-level hierarchical information structure where each level in the menu contains plural items, each said item being at least one of a function, a pointer to a location, and a pointer to another level; and (vi) computer equipment, including, without limitation, computer equipment that stores, serves, hosts, supports, and/or runs any of the foregoing or that allows navigating within a multi-level hierarchical information structure where each level in the menu contains plural items, each said item being at least one of a function, a pointer to a location, and a pointer to another level, and any products, devices, systems, and/or components of systems with the same or substantially the same technical features and/or functionalities. **Direct Infringement** Microchip has directly infringed claims 1-5 and 7-8 of the '836 patent under 35 U.S.C. § 271(a) each time that it makes, uses, tests, and/or hosts in the United States the Accused Instrumentalities, or products, devices, systems, and/or components of systems, that practice the claimed methods described hereinbelow. Microchip also directly infringes each of the Asserted Claims under 35 U.S.C. § 271(a) each time that it imports the Accused Instrumentalities into the United States. **Indirect Infringement** Microchip has induced and continues to induce infringement by others of claims 1-5 and 7-8 of the '836 patent under 35 U.S.C. § 271(b) by (a) providing the Accused Instrumentalities to third parties and intending them to use the Accused Instrumentalities; (b) advertising these Accused Instrumentalities through Microchip's own and through third party websites; (c) encouraging customers and other third parties to communicate directly with Microchip about the Accused Instrumentalities for purposes of technical assistance and repair as well as sales and marketing; (d) providing instructions as to how to use the Accused Instrumentalities in an infringing manner.

Microchip has contributed to and continues to contribute to infringement by others of claims 1-5 and 7-8 of the '836 patent under 35 U.S.C. § 271(c) by providing the Accused Instrumentalities, including web pages and content, user interfaces (e.g., hierarchical collapsing menu structure, hierarchical information structure, information structure, and/or hierarchical menu structure), software, and/or computer equipment as identified above, in the United States without authority, Microchip contributes to the direct infringement of third-parties including end users of the Accused Instrumentalities.

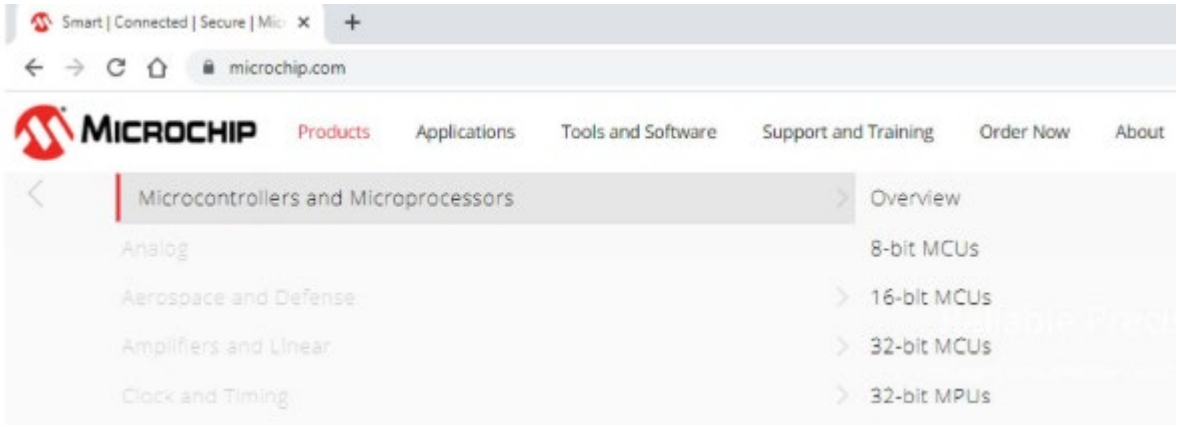
To the extent that the preamble of Claim 1 is a limitation, the '836 Accused Instrumentalities provide, or support the provision of, a method as described below.

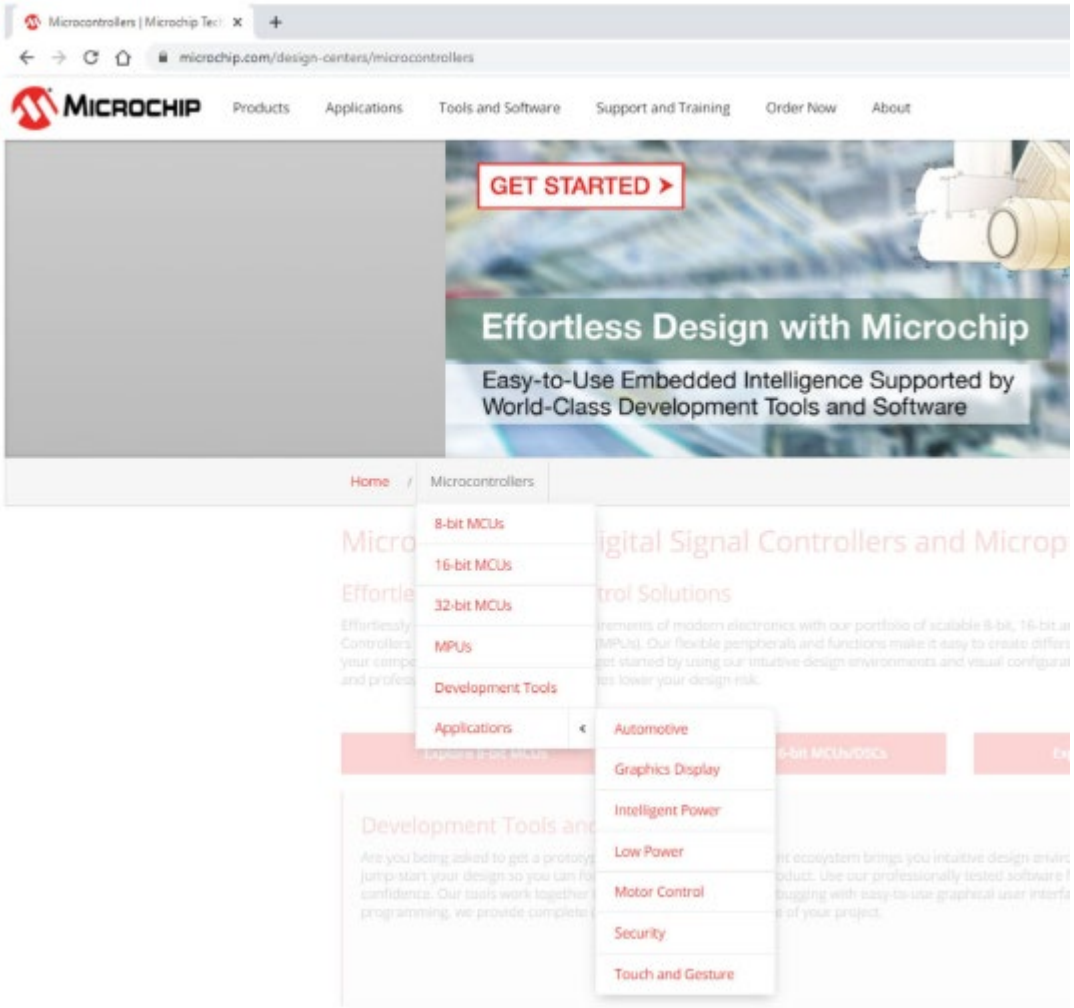
The '836 Accused Instrumentalities provide a method for navigating within a multi-level hierarchical information structure where each level in the menu contains plural items, each said item being at least one of a function, a pointer to a location, and a pointer to another level, as shown below:



See, e.g., https://www.microchip.com/design-centers/automotive-solutions/automotive-applications (last visited Feb. 10, 2020) (annotated).

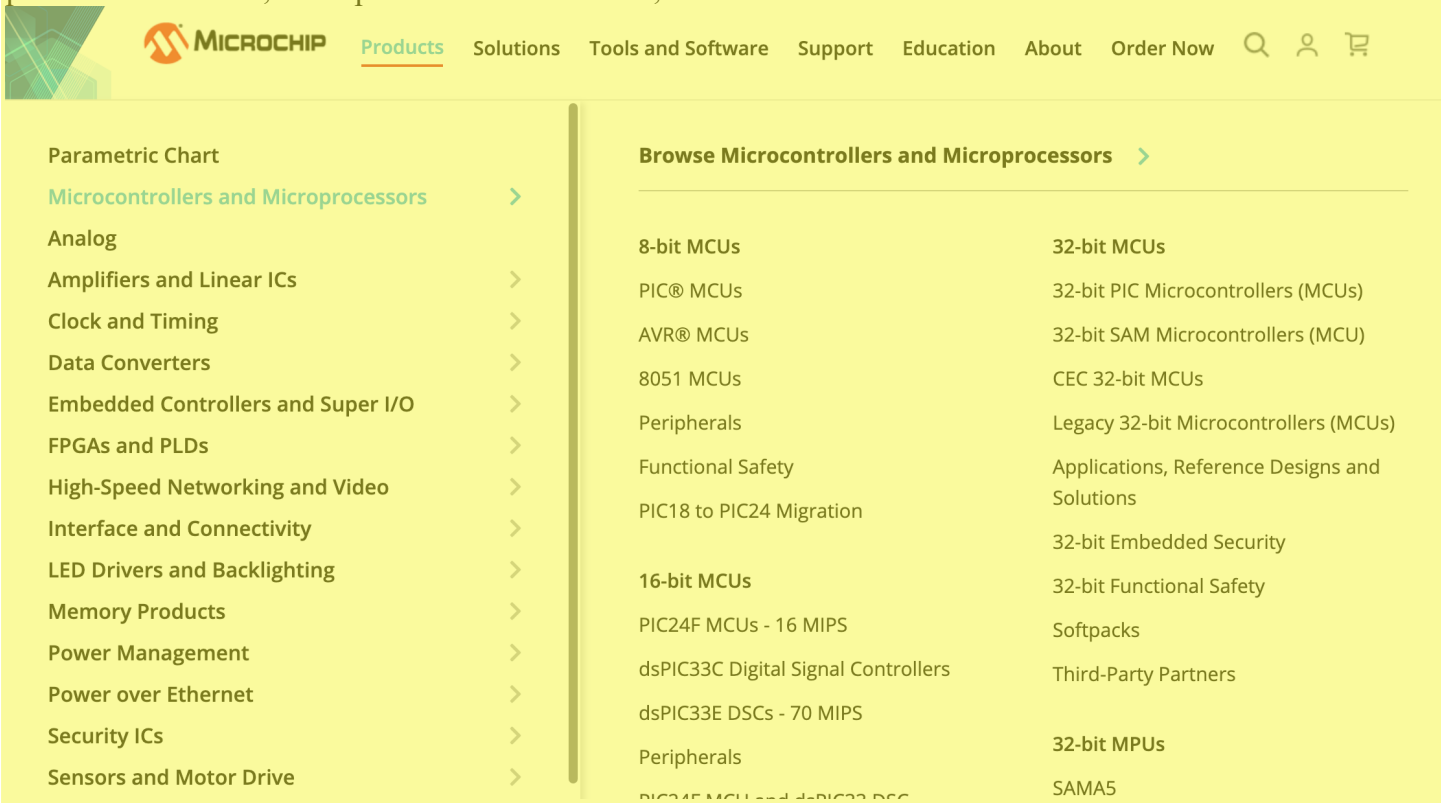
See also MCHP-CADDO_0000930:

	 Smart | Connected | Secure | Mic microchip.com MICROCHIP Products Applications Tools and Software Support and Training Order Now About Microcontrollers and Microprocessors Analog Aerospace and Defense Amplifiers and Linear Clock and Timing Overview 8-bit MCUs 16-bit MCUs 32-bit MCUs 32-bit MPUs

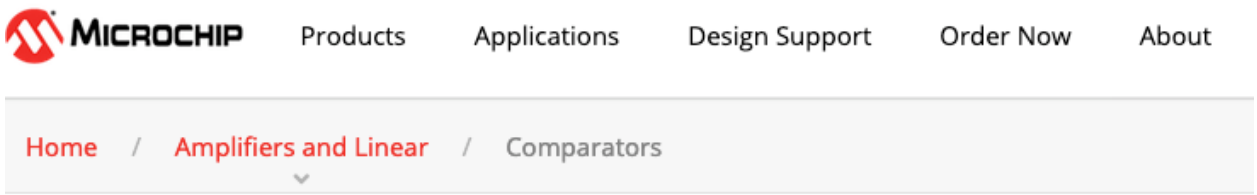


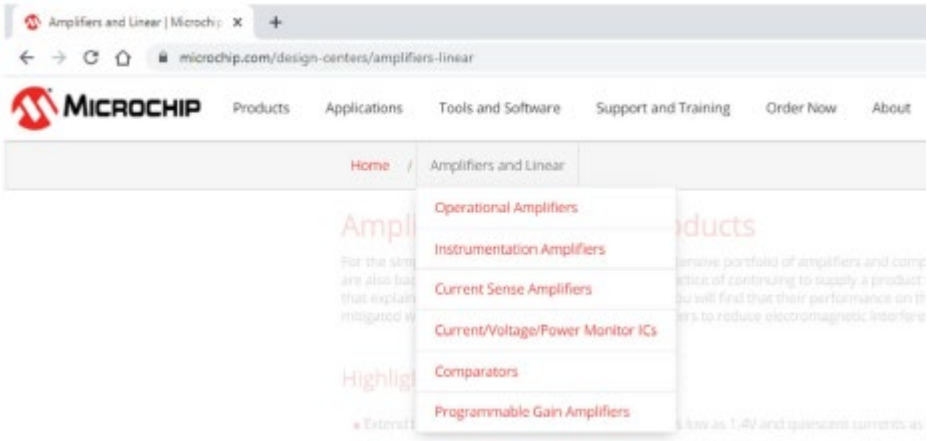
See MCHP-CADDO-0000931.

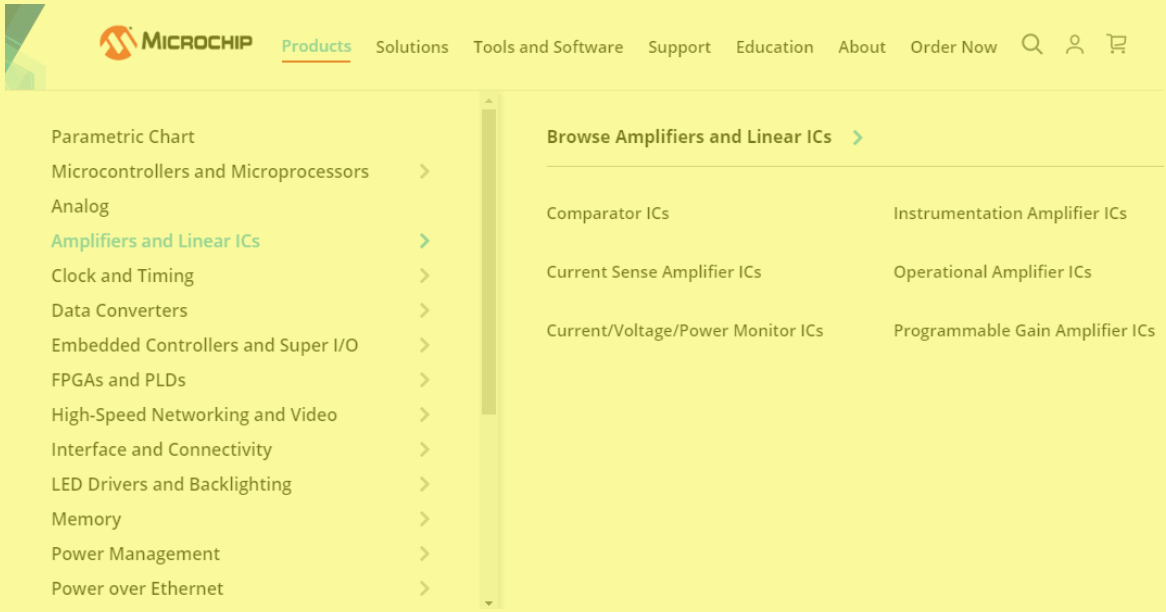
As another example, the '836 Accused Instrumentalities provide a method for navigating within a multi-level hierarchical information structure where each level in the menu contains plural items, each said item being at least one of a function, a pointer to a location, and a pointer to another level, as shown below:



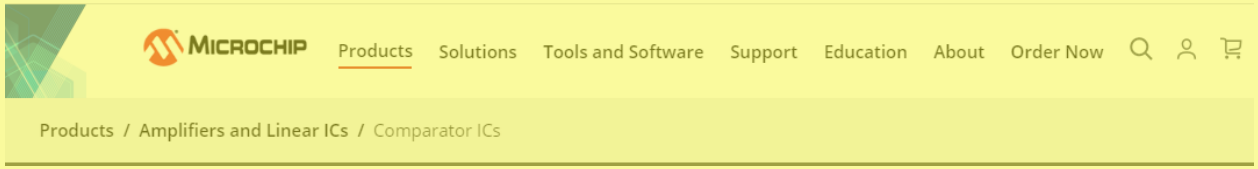
See https://www.microchip.com (last accessed Jun. 8, 2021).

providing a graphical user menu system displaying the items of a given level of the hierarchical information structure and enabling selection thereof and constructing an Active Path as a sequence of active links as the user navigates the information structure using the graphical user menu system, with one said active link corresponding to each of the hierarchical	The '836 Accused Instrumentalities provide a graphical user menu system displaying the items of a given level of the hierarchical information structure and enabling selection thereof and constructing an Active Path, which has been construed by this Court (Dkt. 34) as a sequence of links dynamically created as a menu item is navigated, as a sequence of active links as the user navigates the information structure using the graphical user menu system, with one said active link corresponding to each of the hierarchical levels accessed by the user, said active links providing direct access to one of a function, corresponding level and menu item without the need to navigate using said graphical user menu system. For example, the '836 Accused Instrumentalities provide a graphical user menu system displaying the items of a given level of the hierarchical information structure and enabling selection thereof (*e.g.*, "Products" displays and enables selection of items of a given level, such as "Amplifiers and Linear" and items within that same level). Furthermore, the '836 Accused Instrumentalities construct a sequence of links dynamically created as a menu item is navigated as a sequence of active links as the user navigates the information structure using the graphical user menu system (*e.g.*, the '836 Accused Instrumentalities construct a sequence of links dynamically created active path (*e.g.*, "Amplifiers and Linear—Comparators") as a sequence of active links as the user navigates the information structure using the graphical user menu system (*e.g.*, as "Amplifiers and Linear" and "Comparators" are selected)), with one said active link corresponding to each of the hierarchical levels accessed by the user, said active links providing direct access to one of a function, corresponding level and menu item without the need to navigate using said graphical user menu system (*e.g.*, the '836 Accused Instrumentalities' sequence of links dynamically created as a menu item is navigated "Amplifiers and Linear—Comparators" corresponds to each of the hierarchical levels accessed by the user, including "Amplifiers and Linear" and "Comparators," each link providing direct access to one of a function, corresponding level and menu item without the need to navigate using said graphical user menu system) as shown below:  *See, e.g.*, https://www.microchip.com/design-centers/amplifiers-linear/comparators (last visited Feb. 10, 2020).

levels accessed by the user, said active links providing direct access to one of a function, corresponding level and menu item without the need to navigate using said graphical user menu system;	*See also* MCHP-CADDO_0000935:  As another example, the '836 Accused Instrumentalities construct a sequence of links dynamically created as a menu item is navigated as a sequence of active links as the user navigates the information structure using the graphical user menu system (*e.g.*, the '836 Accused Instrumentalities construct a sequence of links dynamically created as a menu item is navigated (*e.g.*, "Amplifiers and Linear—Comparators") as a sequence of active links as the user navigates the information structure using the graphical user menu system (*e.g.*, as "Amplifiers and Linear" and "Comparators" are selected)), with one said active link corresponding to each of the hierarchical levels accessed by the user, said active links providing direct access to one of a function, corresponding level and menu item without the need to navigate using said graphical user menu system (*e.g.*, the '836 Accused Instrumentalities' sequence of links dynamically created as a menu item is navigated "Amplifiers and Linear—Comparators" corresponds to each of the hierarchical levels accessed by the user, including "Amplifiers and Linear" and "Comparators," each link providing direct access to one of a function, corresponding level and menu item without the need to navigate using said graphical user menu system) as shown below:

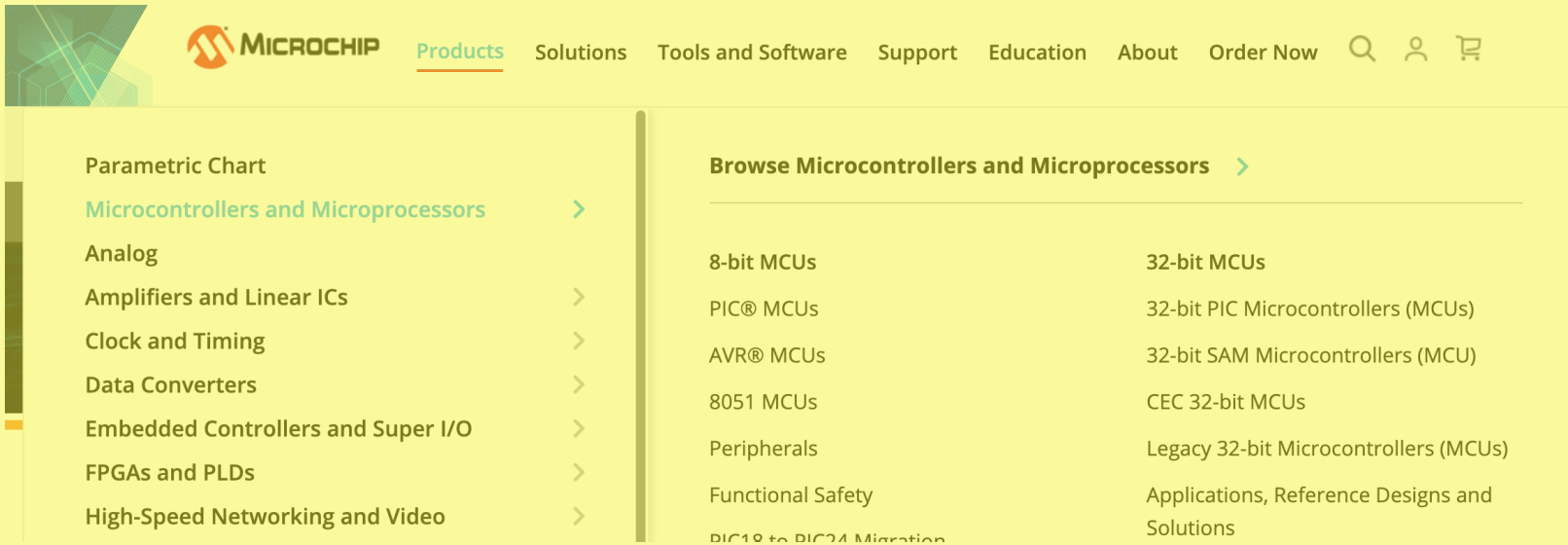


See also https://www.microchip.com/en-us/products/amplifiers-and-linear-ics/comparator-ics (last accessed June 8, 2021); *see id*:

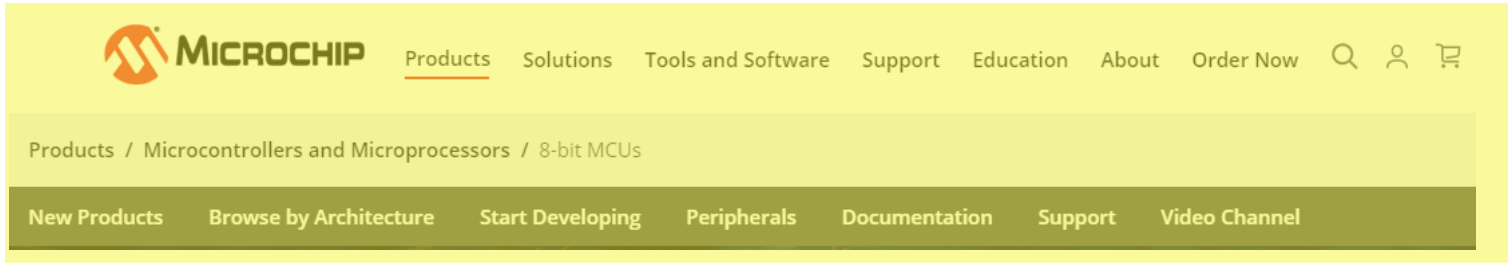


As another example, the '836 Accused Instrumentalities construct a sequence of links dynamically created as a menu item is navigated as a sequence of active links as the user navigates the information structure using the graphical user menu system (*e.g.*, the '836 Accused Instrumentalities construct a sequence of links dynamically created as a menu item is navigated (*e.g.*, "Microcontrollers and Microprocessors—8-bit MCUs") as a sequence of active links as the user navigates the information structure using the graphical user menu system (*e.g.*, as "Microcontrollers and Microprocessors" and "8-bit MCUs" are

selected)), with one said active link corresponding to each of the hierarchical levels accessed by the user, said active links providing direct access to one of a function, corresponding level and menu item without the need to navigate using said graphical user menu system (*e.g.*, the '836 Accused Instrumentalities' sequence of links dynamically created as a menu item is navigated "Microcontrollers and Microprocessors —8-bit MCUs" corresponds to each of the hierarchical levels accessed by the user, including "Microcontrollers and Microprocessors" and "8-bit MCUs," each link providing direct access to one of a function, corresponding level and menu item without the need to navigate using said graphical user menu system) as shown below:



See https://www.microchip.com/en-us/products/microcontrollers-and-microprocessors/8-bit-mcus (last accessed June 8, 2021); *see id.*: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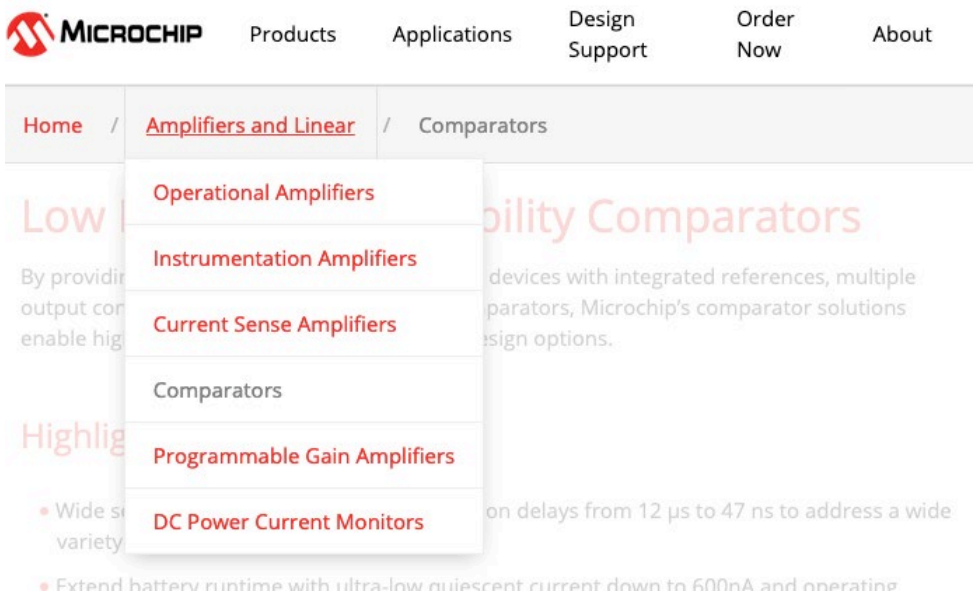
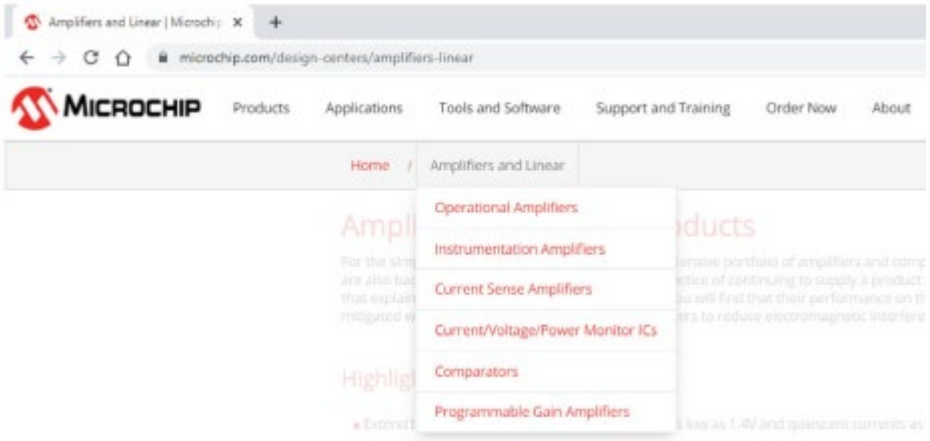
a given said active link enabling the user to browse items of the hierarchical information structure starting from the level corresponding with the given active link and items on hierarchically subordinate levels without affecting the Active Path.	A given said active link in the '836 Accused Instrumentalities enables the user to browse items of the hierarchical information structure starting from the level corresponding with the given active link and items on hierarchically subordinate levels without affecting the Active Path (the term "active path" has been construed by the Court (Dkt. 34) as a sequence of links dynamically created as a menu item is navigated). For example, in the '836 Accused Instrumentalities, a given said active link enables the user to browse items of the hierarchical information structure starting from the level corresponding with the given active link and items on hierarchically subordinate levels without affecting the sequence of links dynamically created as a menu item is navigated (*e.g.*, the '836 Accused Instrumentalities enable the user to browse items of the hierarchical information structure starting from "Amplifiers and Linear" and items on subordinate levels such as "Operational Amplifiers," "Instrumentation Amplifiers," "Current Sense Amplifiers," "Comparators," "Programmable Gain Amplifiers," and "DC Power Current Monitors" without affecting the sequence of links dynamically created as a menu item is navigated "Amplifiers and Linear—Comparators") as shown below:  *See, e.g.*, https://www.microchip.com/design-centers/amplifiers-linear/comparators (last visited Feb. 10, 2020).

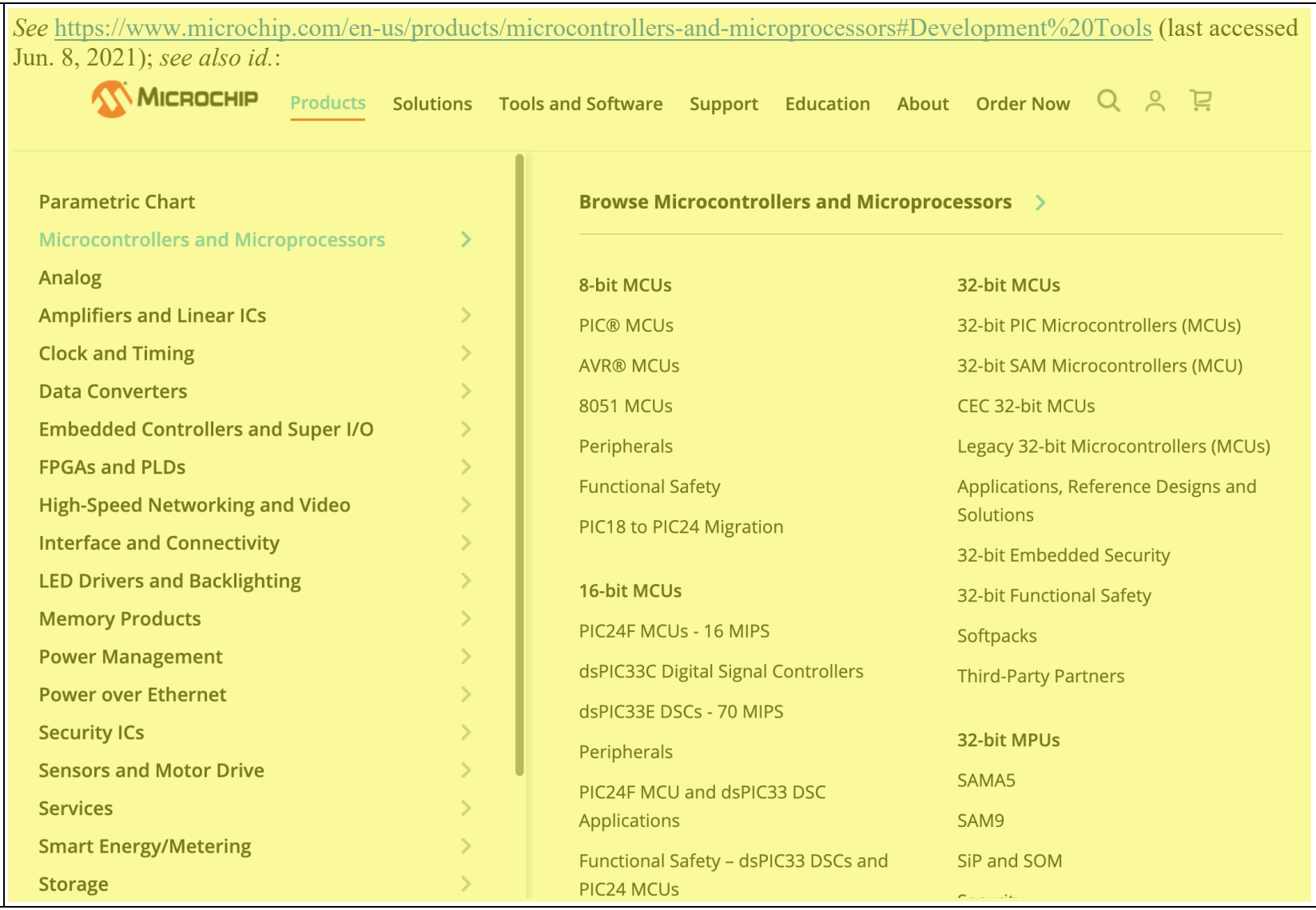
See also MCHP-CADDO_0000935:

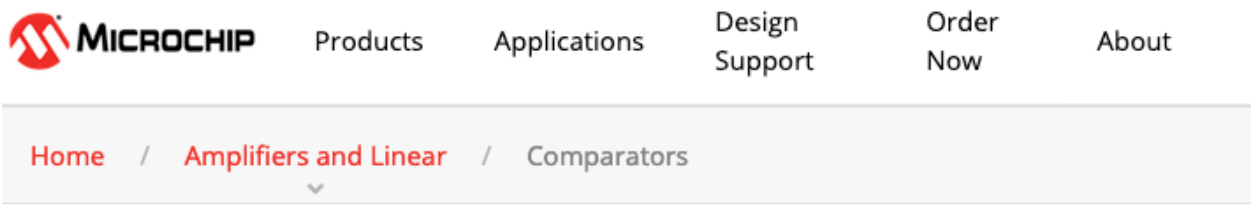
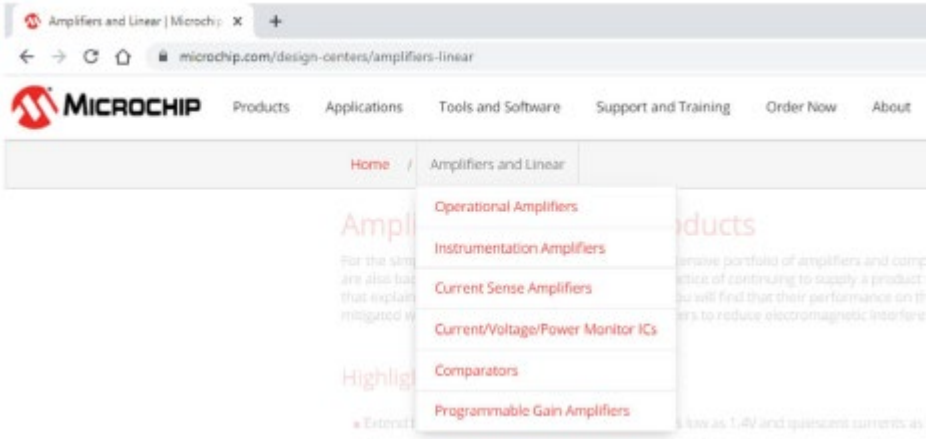


As another example, in the '836 Accused Instrumentalities, a given said active link (e.g., "Microcontrollers and Microprocessors") enables the user to browse items of the hierarchical information structure (e.g., items such as "8-bit MCUs" and "32-bit MCUs") starting from the level corresponding with the given active link (e.g., the level corresponding to "Product Categories" and "Development Tools") and items on hierarchically subordinate levels (e.g., items associated with "Part Number: DM164136" and "Part Number: DM330028") without affecting the Active Path, as shown below:

MICROCHIP
Products
Solutions
Tools and Software
Support
Education
About
Order Now
Products / Microcontrollers and Microprocessors
Product Categories
Development Tools
Software Solutions
Application Design Centers
Product Selections
Featured Development Tools
Development Board
Description
Curiosity High Pin Count (HPC) Development Board
Part Number: DM164136
The Curiosity High Pin Count (HPC) Development Board (DM164136) supports a wide variety of 8-bit MCUs. Curiosity Development Boards are cost-effective, fully-integrated MCU development platforms. The development board includes an integrated programmer/debugger and requires no additional hardware to get started.
Learn More
dsPIC33CH Curiosity Development Board
Part Number: DM330028
Evalute the dual-core dsPIC33CH family using this low-cost board with a configurable power supply load step transient generator. Or customize the board for your application using the two mikroBUS™ interfaces for adding a large variety of click Boards.

See https://www.microchip.com/en-us/products/microcontrollers-and-microprocessors#Development%20Tools (last accessed Jun. 8, 2021); *see also id.*:



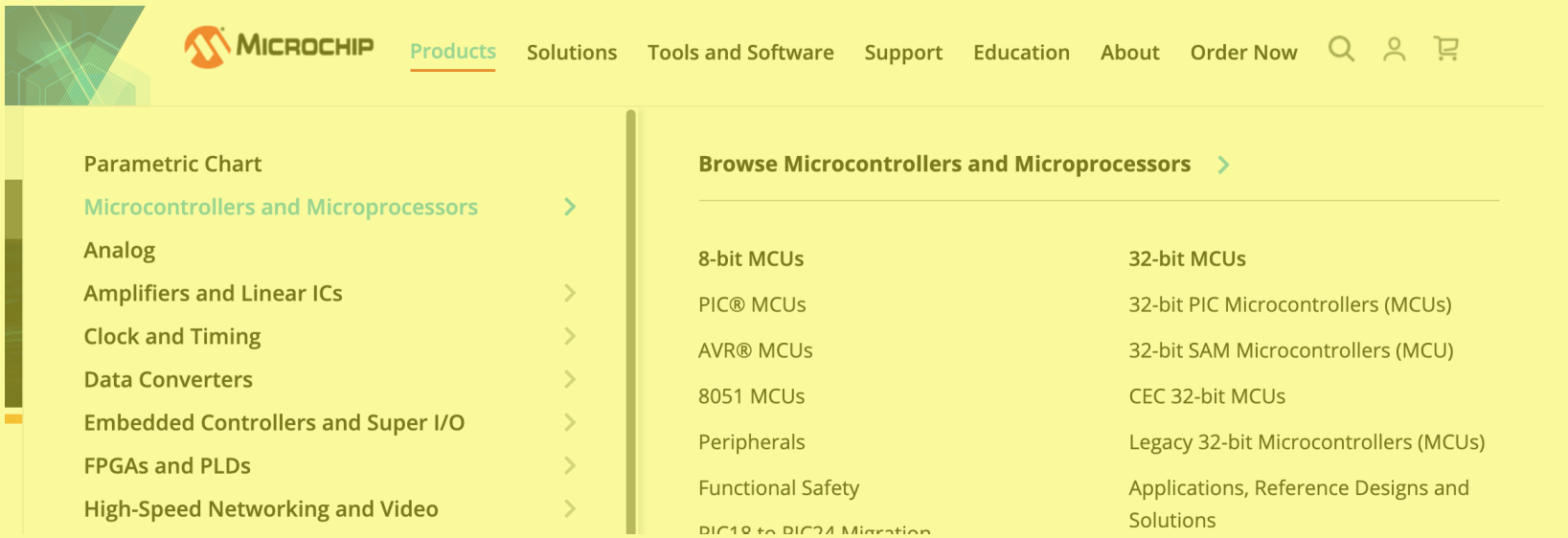
2. The method for navigating according to claim 1, further comprising: providing pre-defined short-cuts enabling direct access to a given menu item; and	The '836 Accused Instrumentalities provide pre-defined short-cuts enabling direct access to a given menu item. For example, the '836 Accused Instrumentalities provide pre-defined short-cuts enabling direct access to a given menu item (*e.g.*, the '836 Accused Instrumentalities provide pre-defined shortcuts, such as "Amplifiers and Linear" or "Comparators" in the collapsing menu enabling direct access to a given menu item) as shown below:  *See, e.g.*, https://www.microchip.com/design-centers/amplifiers-linear/comparators (last visited Feb. 10, 2020).  *See* MCHP-CADDO_0000935.

```
<div class="breadcrumbs-open-btn"><span>Menu</span></div>
<div class="breadcrumbs">
    <div class="breadcrumbs-top-bar">
        <span class="breadcrumbs-close-btn">×</span>
    </div>

    <div class="crumbs-wrapper">
        <div class="crumb">
            <div class="crumb-top">
                <a href="/">Home</a>
            </div>
        </div>
        <span class="breadcrumbs-separator">/</span>

                <div class="crumb has-menu">
                    <div class="crumb-top  current">
                        <a href="/design-centers/amplifiers-linear">Amplifiers and Linear</a>
                                <div class="open-menu"><i class="fa fa-angle-down"></i></div>
                    </div>
                     <ul>
    <li class="">
            <a class=" " href="/design-centers/amplifiers-linear/operational-amplifiers">Operational Amplifiers</a>
    </li>
    <li class="">
            <a class=" " href="/design-centers/amplifiers-linear/instrumentation-amplifiers">Instrumentation Amplifiers</a>
    </li>
    <li class="">
            <a class=" " href="/design-centers/amplifiers-linear/current-sense-amplifiers">Current Sense Amplifiers</a>
    </li>
    <li class="">
```

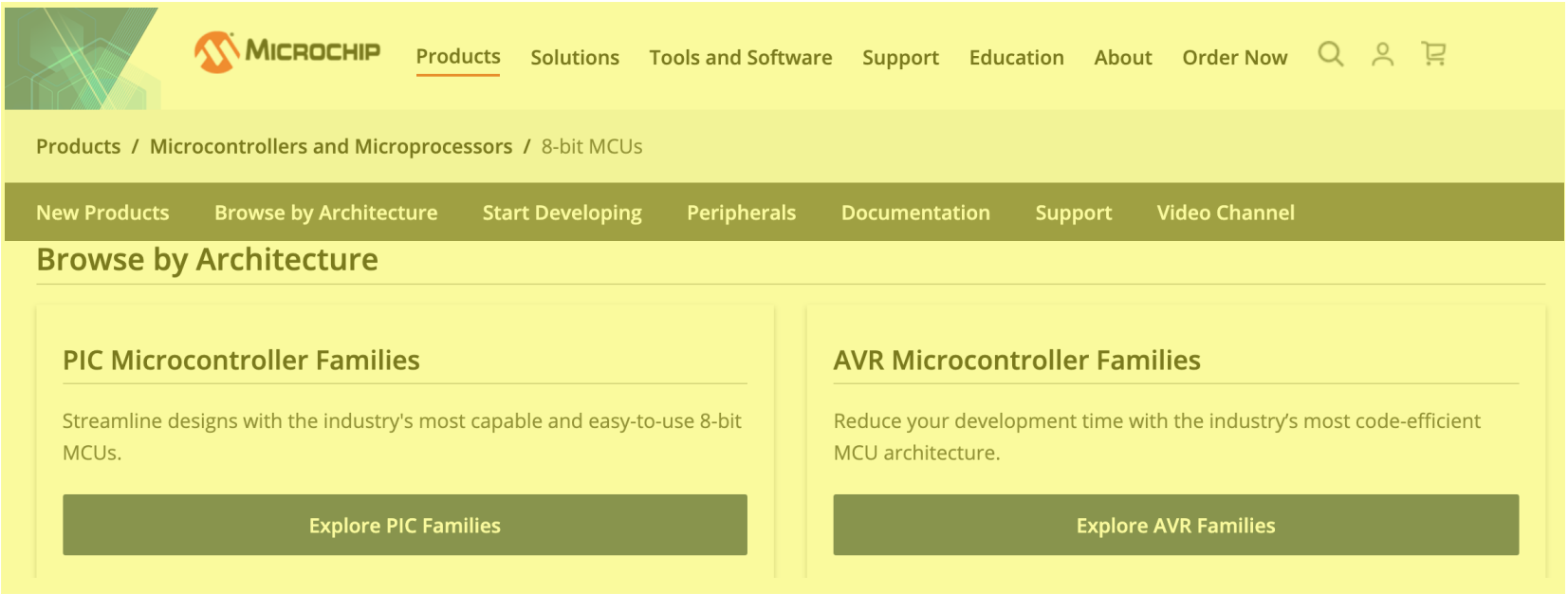
```
349             <a class=" " href="/design-centers/amplifiers-linear/current-voltage-p
    ower-monitors">Current/Voltage/Power Monitor ICs</a>
350         </li>
351         <li class="">
352             <a class=" " href="/design-centers/amplifiers-linear/comparators">Comp
    arators</a>
353         </li>
354         <li class="">
355             <a class=" " href="/design-centers/amplifiers-linear/programmable-gain
    -amplifiers">Programmable Gain Amplifiers</a>
356         </li>
357                         </ul>
358                     </div>
359
360         </div>
361     </div>
362     <div class="breadcrumbs-curtain"></div>
363
364     <div class="row" data-sf-element="Row">
```

See MCHP-CADDO_0001040-41.

For example, the '836 Accused Instrumentalities further provide pre-defined shortcuts to enable direct access to a given item (*e.g.*, the '836 Accused Instrumentalities provide pre-defined shortcuts such as "Microcontrollers and Microprocessors" or "8-bit MCUs" in the collapsing menu enabling direct access to a given menu item), as shown below:



See https://www.microchip.com/en-us/products/microcontrollers-and-microprocessors/8-bit-mcus (last accessed June 7, 2021).


MICROCHIP
Products
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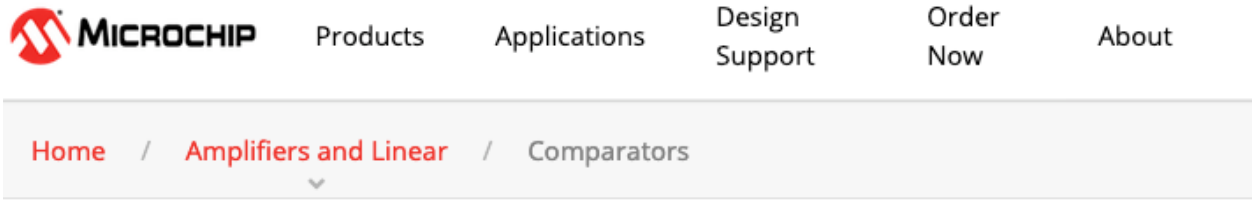
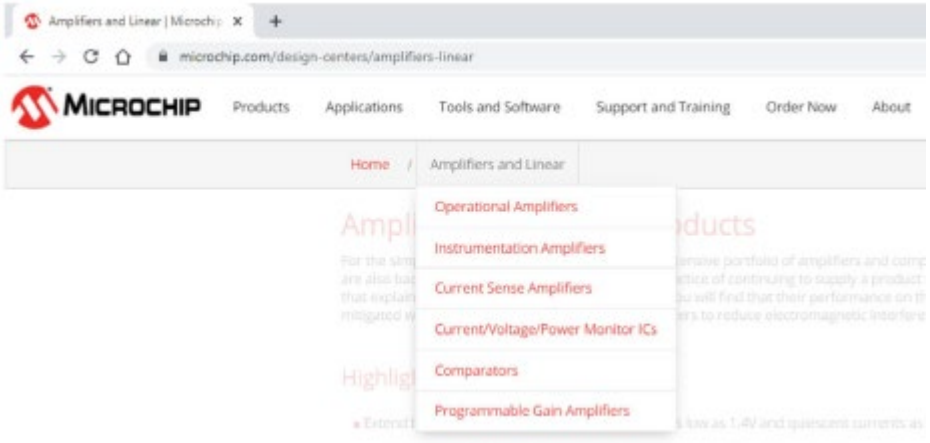
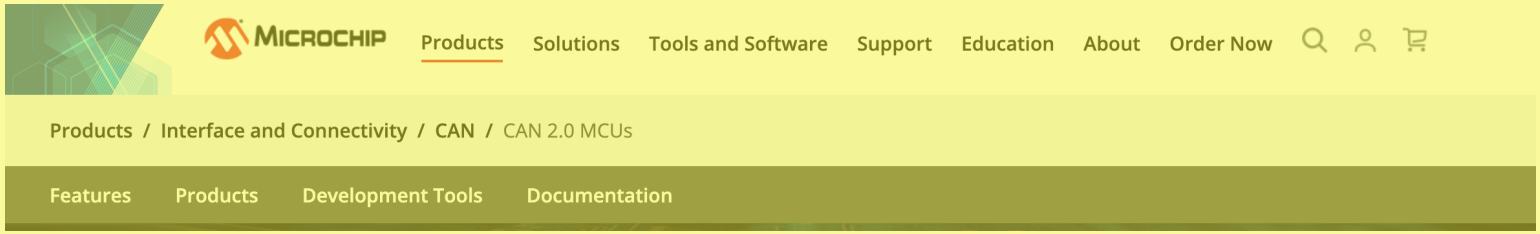
New Products
Browse by Architecture
Start Developing
Peripherals
Documentation
Support
Video Channel
Browse by Architecture
PIC Microcontroller Families
Streamline designs with the industry's most capable and easy-to-use 8-bit MCUs.
Explore PIC Families
AVR Microcontroller Families
Reduce your development time with the industry's most code-efficient MCU architecture.
Explore AVR Families

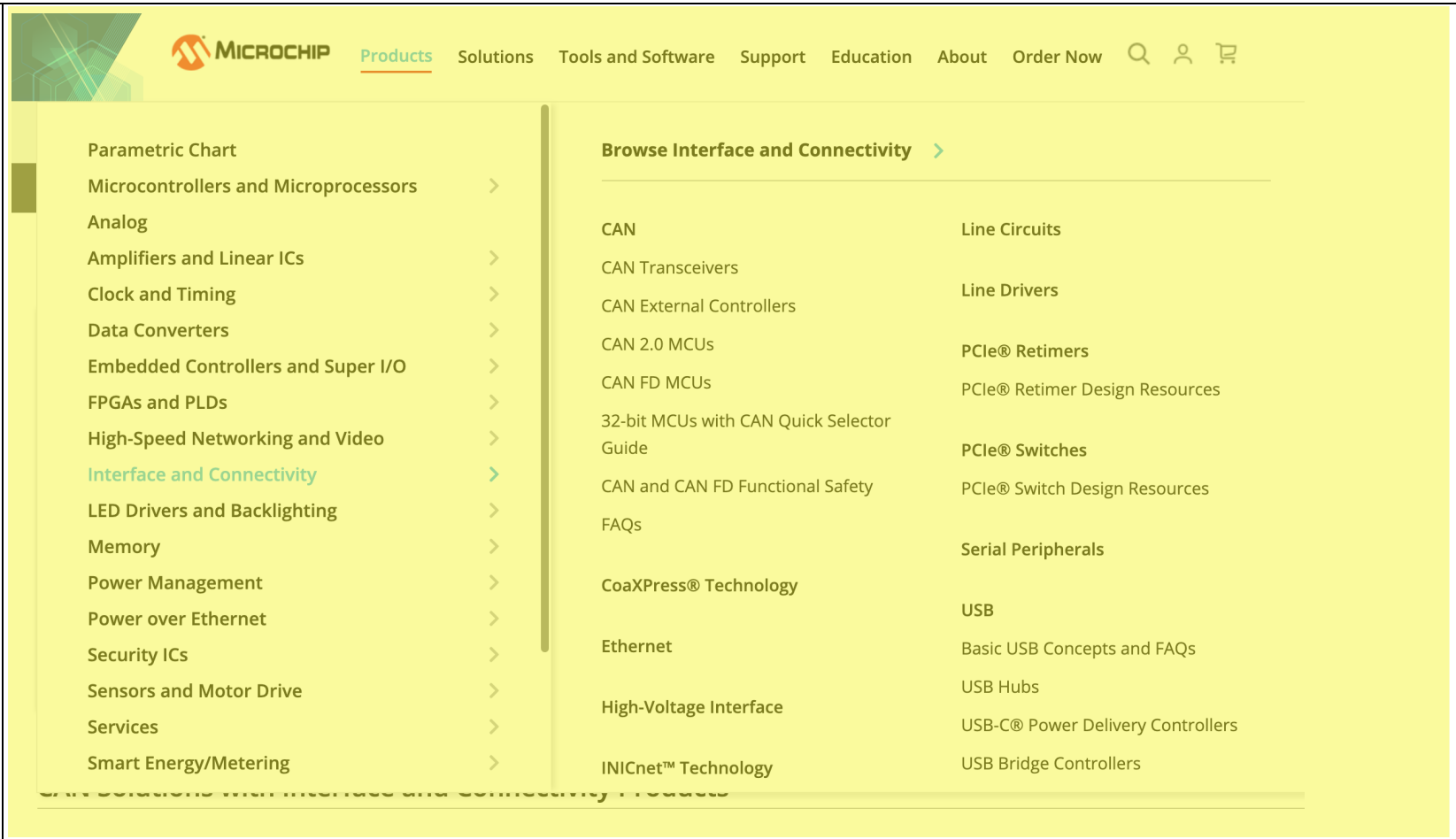
dynamically constructing the Active Path when a pre-defined short-cut is executed, with one said active link corresponding to each of the menu items necessary to access said given menu item using said graphical user menu system.	The '836 Accused Instrumentalities dynamically construct the Active Path, which has been construed by this Court (Dkt. 34) as a sequence of links dynamically created as the menu system is navigated, when a pre-defined short-cut is executed, with one said active link corresponding to each of the menu items necessary to access said given menu item using said graphical user menu system. For example, the '836 Accused Instrumentalities dynamically construct the sequence of links dynamically created as the menu system is navigated when a pre-defined short-cut is executed, with one said active link corresponding to each of the menu items necessary to access said given menu item using said graphical user menu system (*e.g.*, the sequence of links dynamically created as a menu item is navigated is automatically constructed when "Amplifiers and Linear" or "Comparators" is executed, with each active link "Amplifiers and Linear" or "Comparators" corresponding to each of the menu items necessary to access the given menu item using the graphical user menu system).  *See, e.g.*, https://www.microchip.com/design-centers/amplifiers-linear/comparators (last visited Feb. 10, 2020). *See also* MCHP-CADDO_0000935:



As another example, the '836 Accused Instrumentalities dynamically construct the sequence of links dynamically created as the menu system is navigated when a pre-defined short-cut is executed (e.g., when the short-cut corresponding to the link "CAN 2.0 MCUs" is executed), with one said active link (e.g., the link "CAN 2.0 MCUs" in the path "Products / Interface and Connectivity / CAN / CAN 2.0 MCUs") corresponding to each of the menu items necessary to access said given menu item using said graphical user menu system (e.g., the link "CAN 2.0 MCUs" corresponding to the menu item "CAN 2.0 MCUs"), as shown below:



See, e.g., https://www.microchip.com/en-us/products/interface-and-connectivity/can/can-2-0-mcus; *see also id.*: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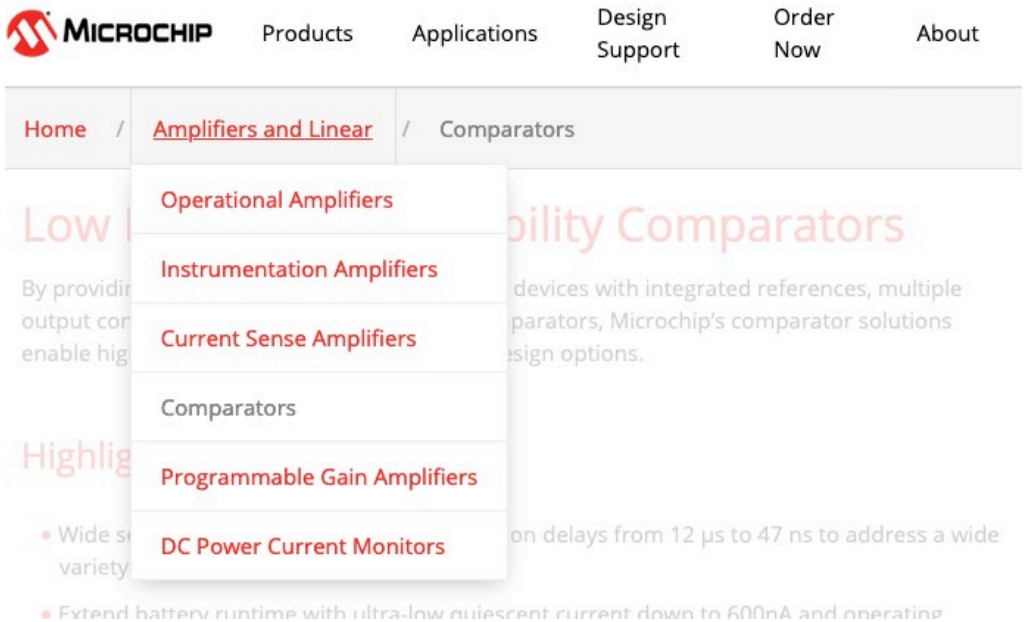
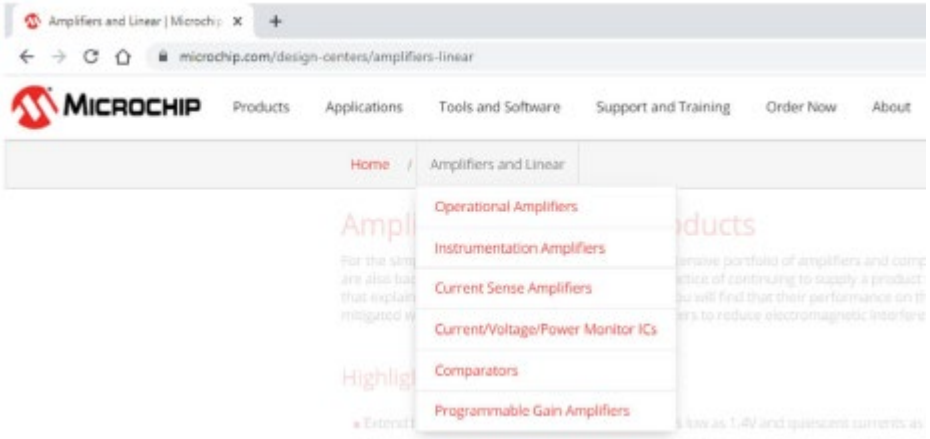
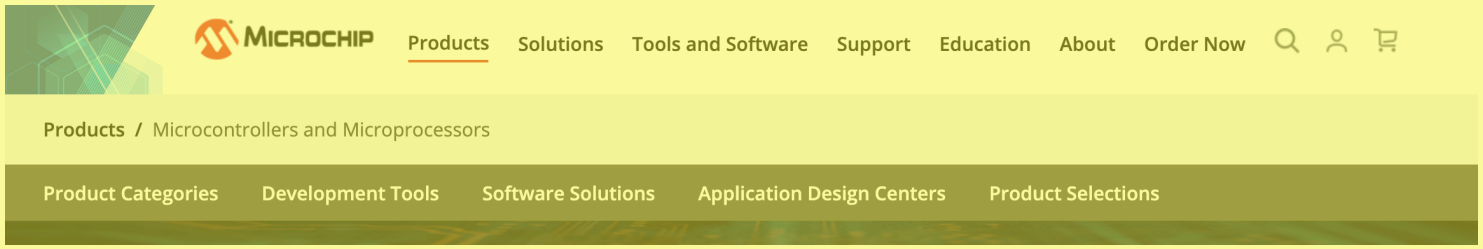
3. The method for navigating according to claim 1, wherein rolling over a selected active link triggers the display of sibling menu items on the hierarchically subordinate levels associated with said selected active link.	The '836 Accused Instrumentalities allow rolling over a selected active link triggers the display of sibling menu items on the hierarchically subordinate levels associated with said selected active link. For example, in the '836 Accused Instrumentalities, rolling over a selected active link triggers the display of sibling menu items on the hierarchically subordinate levels associated with said selected active link (*e.g.*, the '836 Accused Instrumentalities allow rolling over the link "Amplifiers and Linear" to trigger the display of sibling menu items on the hierarchically subordinate levels associated with the selected active link "Amplifiers and Linear" such as "Operational Amplifiers," "Instrumentation Amplifiers," "Current Sense Amplifiers," "Comparators," "Programmable Gain Amplifiers," and "DC Power Current Monitors") as shown below:  *See, e.g.*, https://www.microchip.com/design-centers/amplifiers-linear/comparators (last visited Feb. 10, 2020). As another example, rolling over a selected active link triggers the display of sibling menu items on the hierarchically subordinate levels associated with said selected active link (*e.g.*, the '836 Accused Instrumentalities allow rolling over the link

"Amplifiers and Linear" to trigger the display of sibling menu items on the hierarchically subordinate levels associated with the selected active link "Amplifiers and Linear" such as "Operational Amplifiers," "Instrumentation Amplifiers," "Current Sense Amplifiers," "Comparators," "Programmable Gain Amplifiers," and "Current/Voltage/Power Monitor ICs") as shown below:



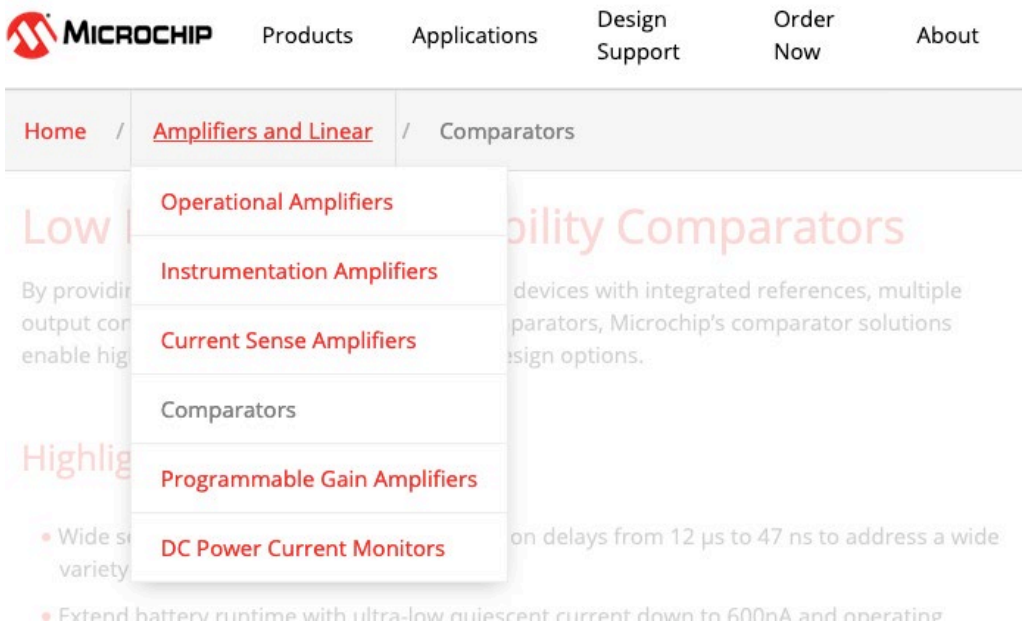
See MCHP-CADDO_0000935.

As another example, in the '836 Accused Instrumentalities, rolling over a selected active link (e.g., rolling over and selecting "Microcontrollers and Microprocessors" in "Products / Microcontrollers and Microprocessors / 8-bit MCUs") triggers the display of sibling menu items on the hierarchically subordinate levels associated with said selected active link (e.g., "Product Categories," "Developments," "Software Solutions," "Application Design Centers," and "Product Selections") as shown below:

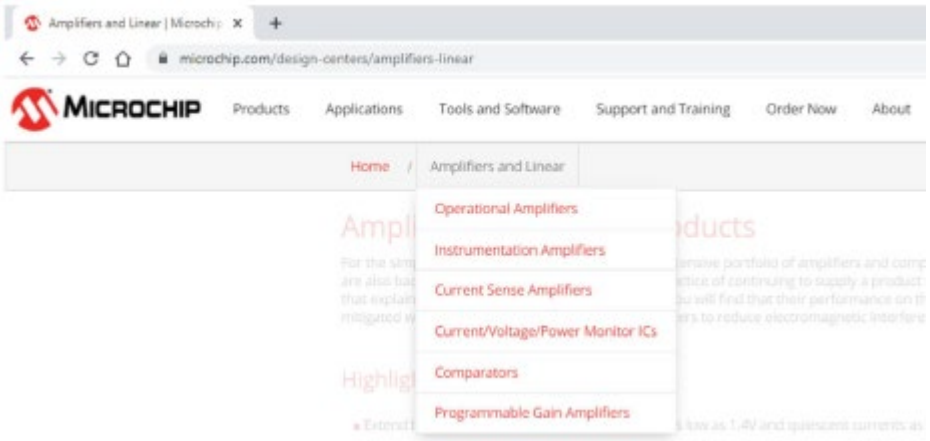


See https://www.microchip.com/en-us/products/microcontrollers-and-microprocessors (last accessed Jun. 8, 2021).

	To the extent Microchip contends that the '836 Accused Instrumentalities do not literally meet the limitation of rolling over a selected active link triggers the display of sibling menu items on the hierarchically subordinate levels associated with said selected active link, the limitation is met under the doctrine of equivalents by the '836 Accused Instrumentalities because it performs substantially the same function (displaying items such as "Product Categories," "Developments," "Software Solutions," "Application Design Centers," and "Product Selections") in substantially the same way (e.g., displaying the menu items on the hierarchically subordinate levels associated with the active link "Microcontrollers and Microprocessors") to produce substantially the same result (e.g., sibling menu items on the hierarchically subordinate levels associated with "Microcontrollers and Microprocessors" are displayed).

4. The method for navigating according to claim 1, wherein selecting a given active link triggers the execution of a function associated with said given active link.	Selecting a given active link in the '836 Accused Instrumentalities triggers the execution of a function associated with said given active link. For example, the '836 Accused Instrumentalities allow selecting a given active link triggers the execution of a function associated with said given active link (*e.g.*, selecting a given active link such as "Amplifiers and Linear" triggers the execution of a function, such as displaying sibling menus (*e.g.*, "Operational Amplifiers," "Instrumentation Amplifiers," "Current Sense Amplifiers," "Comparators," "Programmable Gain Amplifiers," and "DC Power Current Monitors") or directing user to certain content) as shown below:  *See, e.g.*, https://www.microchip.com/design-centers/amplifiers-linear/comparators (last visited Feb. 10, 2020). As another example, the '836 Accused Instrumentalities allow selecting a given active link triggers the execution of a function associated with said given active link (*e.g.*, selecting a given active link such as "Amplifiers and Linear" triggers the execution

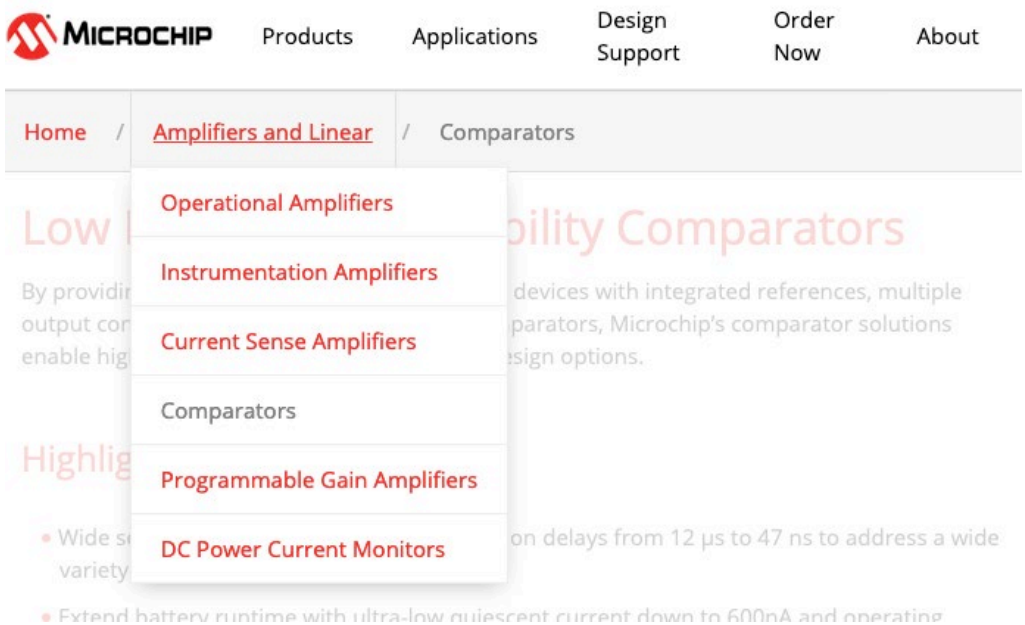
of a function, such as displaying sibling menus (*e.g.*, "Operational Amplifiers," "Instrumentation Amplifiers," "Current Sense Amplifiers," "Comparators," "Programmable Gain Amplifiers," and "Current/Voltage/Power Monitor ICs") as shown below:

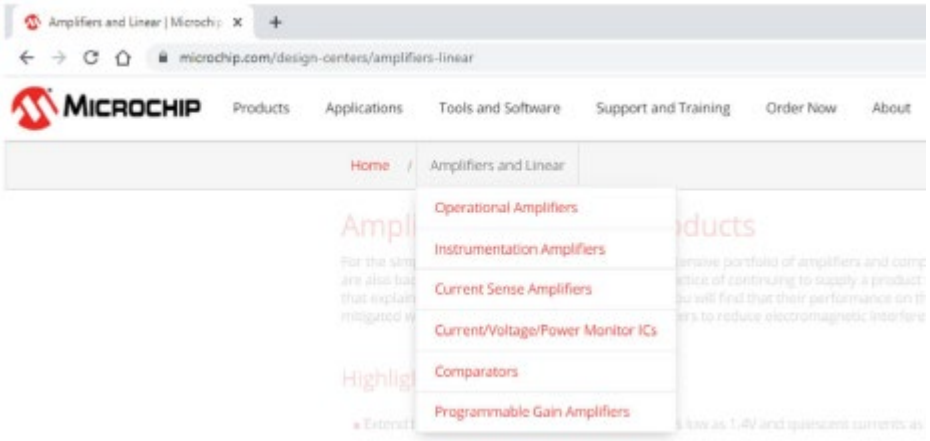


See MCHP-CADDO_0000935.

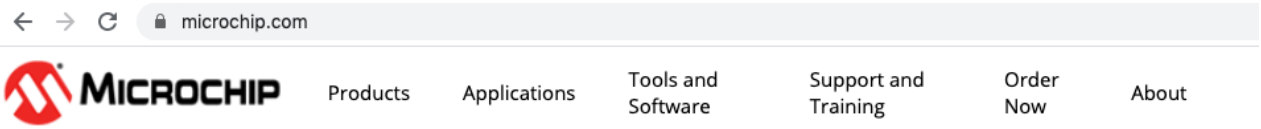
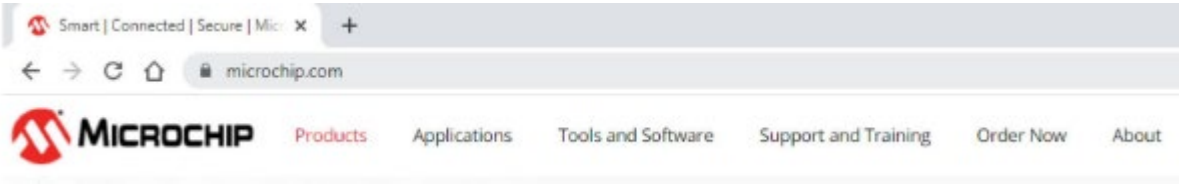
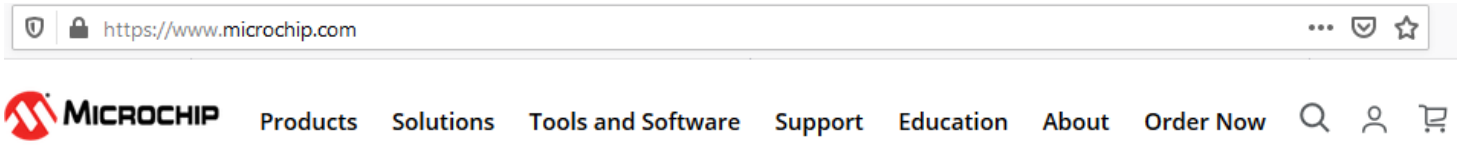
As another example, selecting a given active link triggering the execution of a function associated with said given active link (*e.g.*, selecting a given active link such as "CAN" in the path "Products / Interface and Connectivity / CAN" triggers the execution of a function, such as displaying sibling menus (*e.g.*, "MCU, DSC and MPU Products," "Interface and Connectivity Products," "Development Tools," and "Documentation" associated with "CAN") or directing user to certain content such as content under the link "CAN"), as shown below:

	See, e.g., https://www.microchip.com/en-us/products/interface-and-connectivity/can (last accessed June 8, 2021).

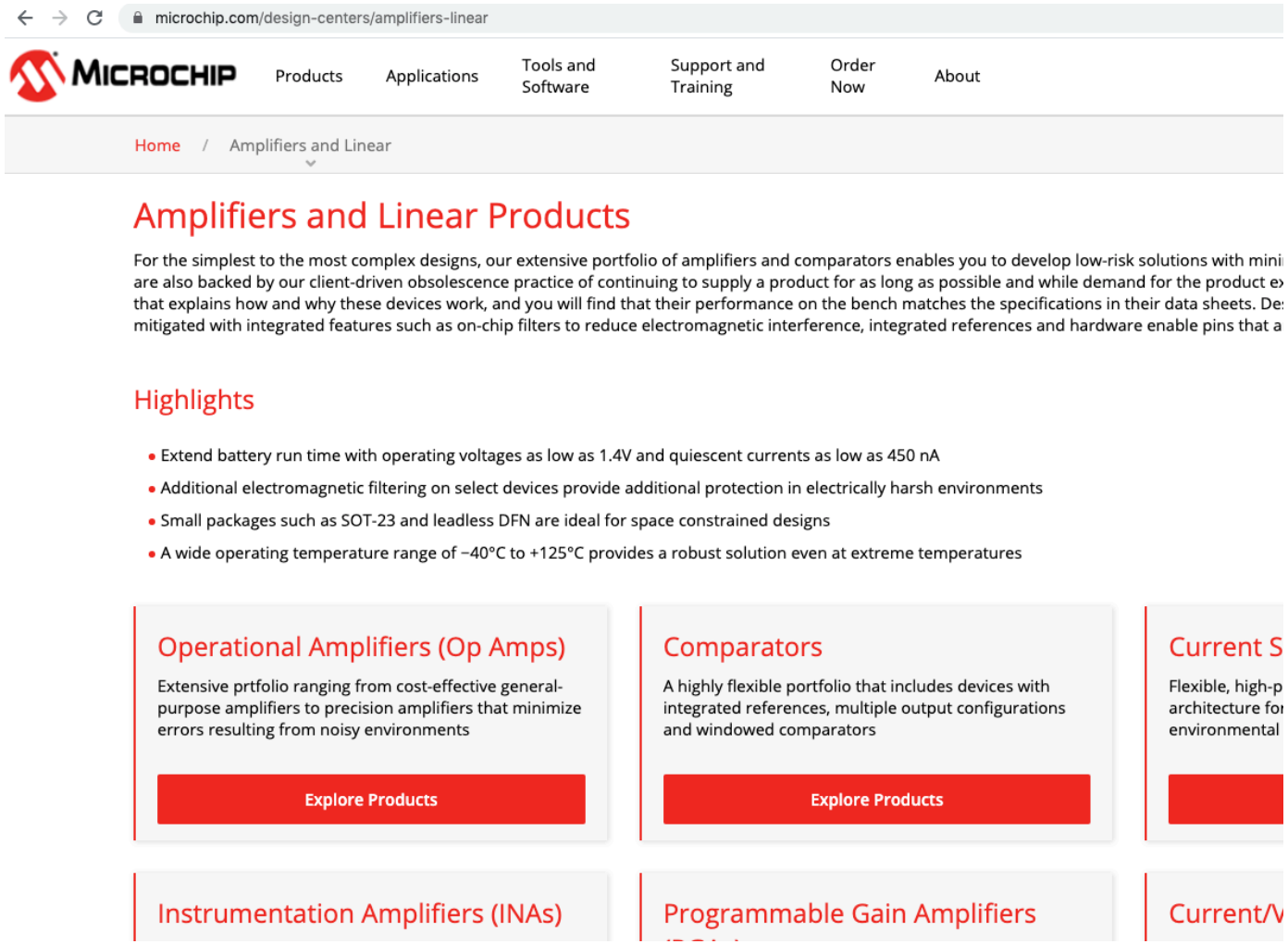
5. The method for navigating according to claim 1, wherein selecting a given active link triggers display of information associated with said given active link.	Selecting a given active link in the '836 Accused Instrumentalities triggers display of information associated with said given active link. For example, the '836 Accused Instrumentalities allow selecting a given active link to trigger display of information associated with said given active link (*e.g.*, the '836 Accused Instrumentalities allow selecting the link "Amplifiers and Linear" to trigger display of information (*e.g.*, displaying "Operational Amplifiers," "Instrumentation Amplifiers," "Current Sense Amplifiers," "Comparators," "Programmable Gain Amplifiers," and "DC Power Current Monitors") associated with the link "Amplifiers and Linear") as shown below:  *See, e.g.*, https://www.microchip.com/design-centers/amplifiers-linear/comparators (last visited Feb. 10, 2020).

	As another example, the '836 Accused Instrumentalities allow selecting a given active link to trigger display of information associated with said given active link (*e.g.*, the '836 Accused Instrumentalities allow selecting the link "Amplifiers and Linear" to trigger display of information (*e.g.*, displaying "Operational Amplifiers," "Instrumentation Amplifiers," "Current Sense Amplifiers," "Comparators," "Programmable Gain Amplifiers," and "Current/Voltage/Power Monitor ICs") associated with the link "Amplifiers and Linear") as shown below:  *See* MCHP-CADDO_0000935. As another example, selecting a given active link triggers the display of information associated with said given active link (*e.g.*, selecting a given active link such as "CAN" in the path "Products / Interface and Connectivity / CAN " triggers the display of the information associated with said given active link (*e.g.*, "MCU, DSC and MPU Products," "Interface and Connectivity Products," "Development Tools," and "Documentation" associated with "CAN") or directing user to certain content such as content under the link "CAN"), as shown below:

See, e.g., https://www.microchip.com/en-us/products/interface-and-connectivity/can (last accessed June 8, 2021).

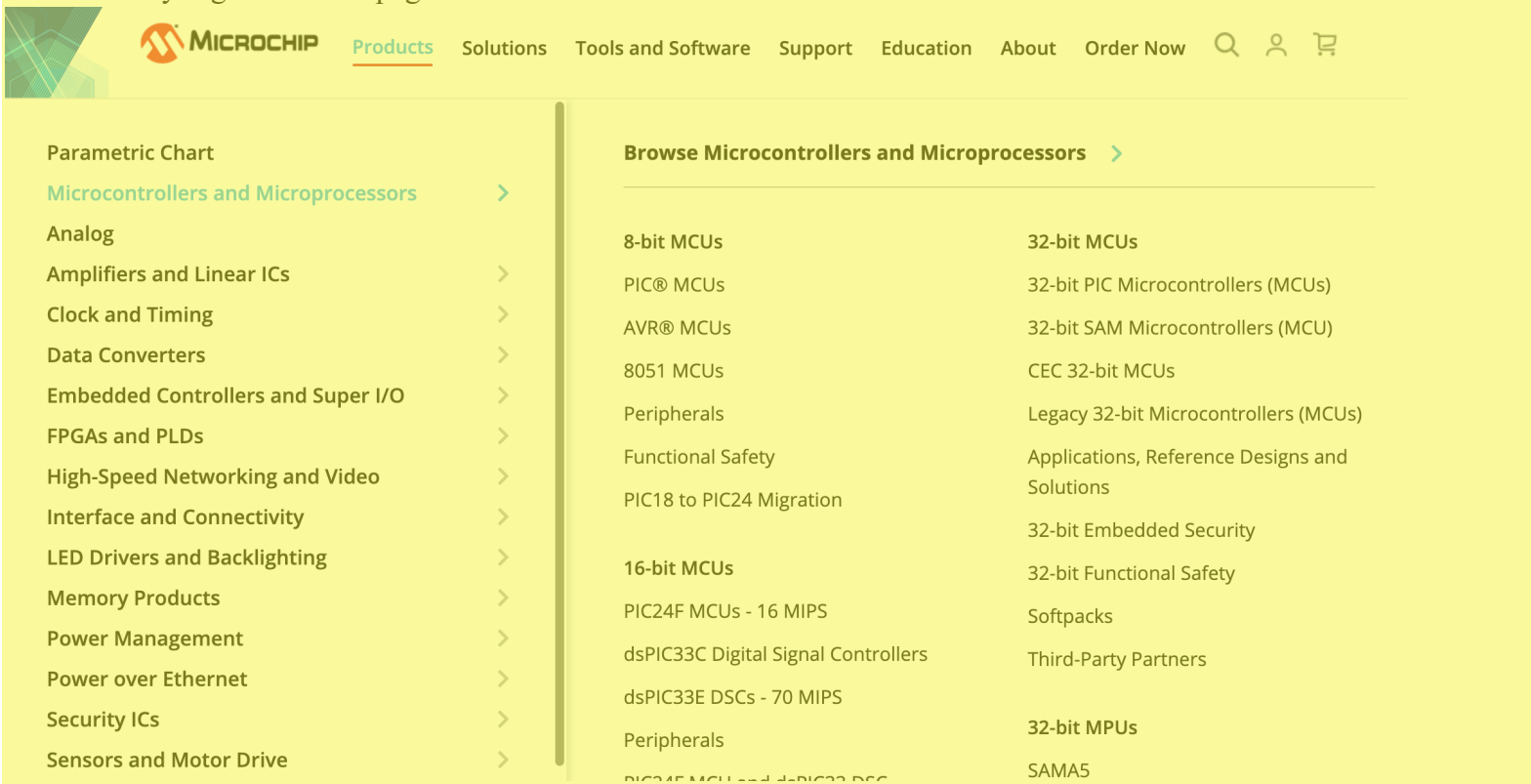
7. The method according to claim 1, wherein the multi-level hierarchical information structure is a website.	The multi-level hierarchical information structure in the '836 Accused Instrumentalities is a website. For example, the multi-level hierarchical information structure in the '836 Accused Instrumentalities is a website as shown below:  (*See, e.g.,* https://www.microchip.com/ (last visited Feb. 10, 2020). *See also* MCHP-CADDO_0000934:  *See also* https://www.microchip.com/ (last accessed June 8, 2021): 

8. A method for navigating websites including a plurality of hierarchically organized web pages, said method comprising:	To the extent that the preamble of Claim 8 is a limitation, the '836 Accused Instrumentalities provide, or support the provision of, a method as described below. The '836 Accused Instrumentalities provide a method for navigating websites including a plurality of hierarchically organized web pages. For example, the '836 Accused Instrumentalities provide a method for navigating websites including a plurality of hierarchically organized web pages as shown below:

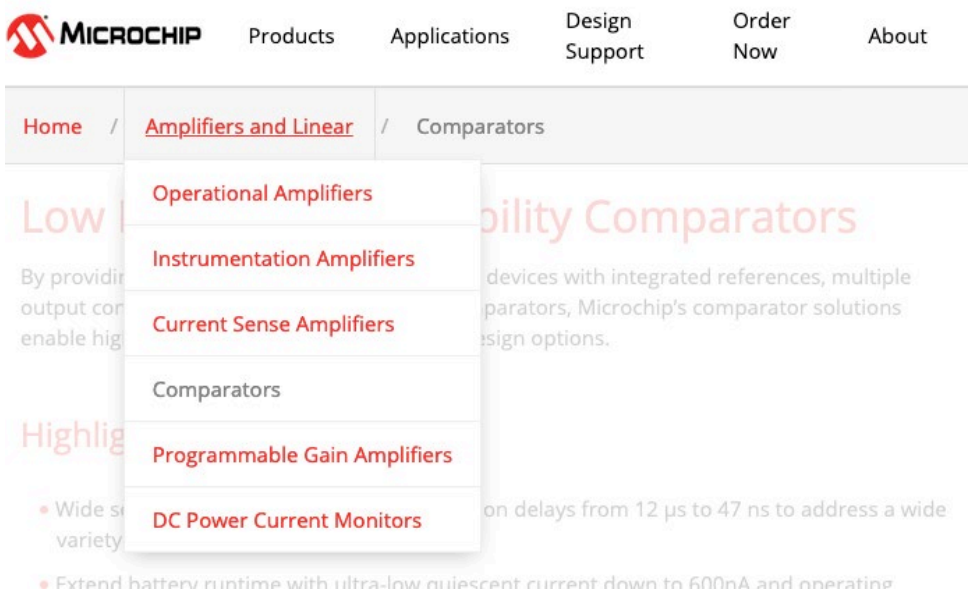


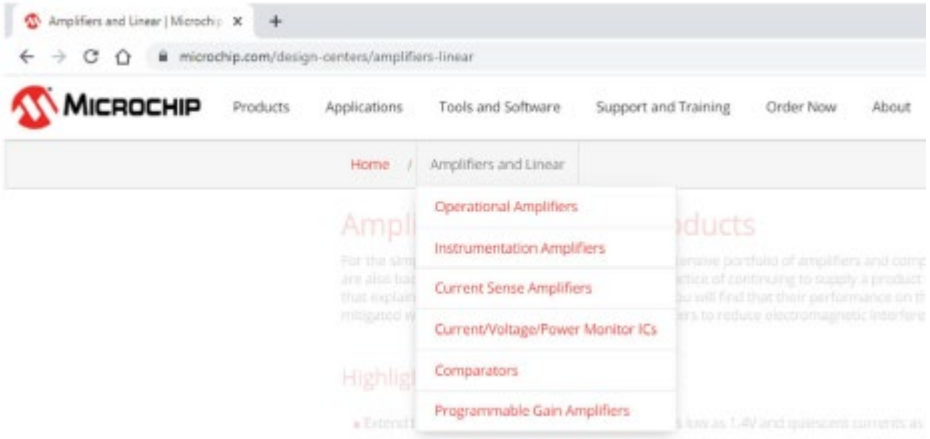
See, e.g., https://www.microchip.com/ (last visited Feb. 10, 2020).

As another example, the '836 Accused Instrumentalities provide a method for navigating websites including a plurality of hierarchically organized web pages as shown below:



See https://www.microchip.com (last accessed Jun. 8, 2021).

providing a means for navigating the multi-level hierarchical website;	The '836 Accused Instrumentalities provide a means for navigating the multi-level hierarchical website. The Court has construed this term (Dkt.. 34) and determined it is governed by 35 U.S.C. § 112(6). The function of this term is navigating the multi-level hierarchical website, and the structure of this means-plus-function claim is a graphical user menu system. Based on the Court's construction, the '836 Accused Instrumentalities provide a means for navigating the multi-level hierarchical website (*e.g.*, the '836 Accused Instrumentalities provide a graphical user menu system for navigating a multi-level hierarchical website), including through the graphical user menu system shown below:  *See, e.g.*, https://www.microchip.com/design-centers/amplifiers-linear/comparators (last visited Feb. 10, 2020). *See also* MCHP-CADDO_0000935: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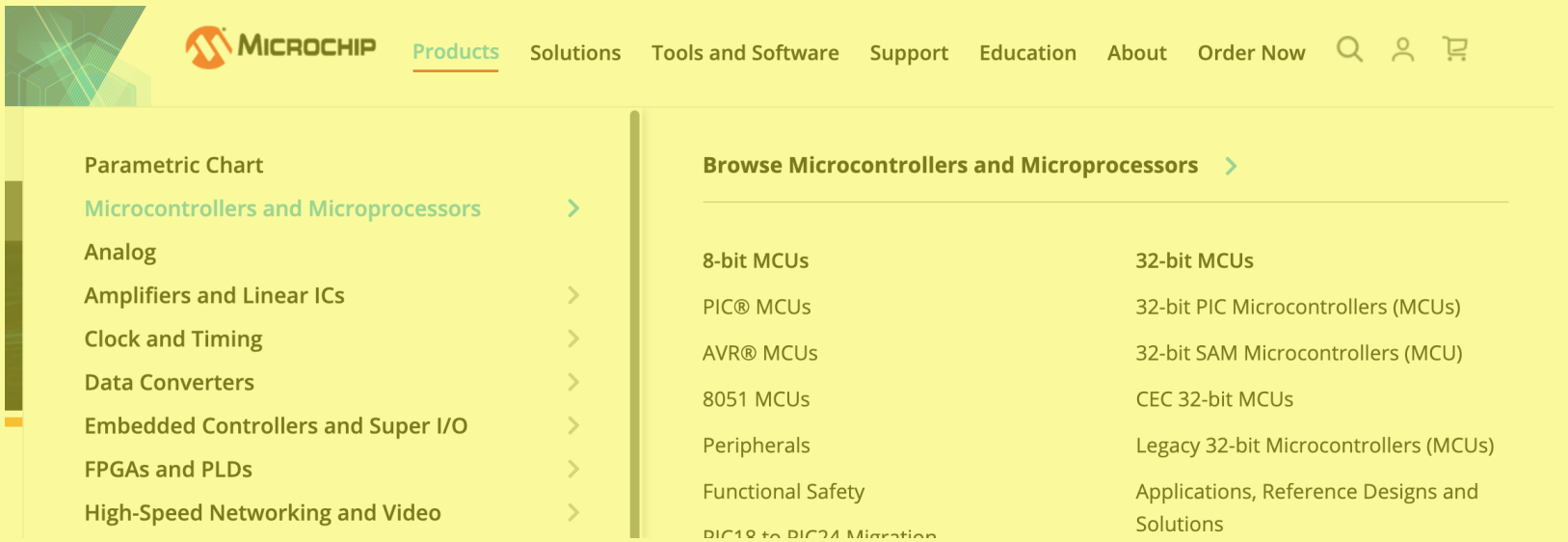
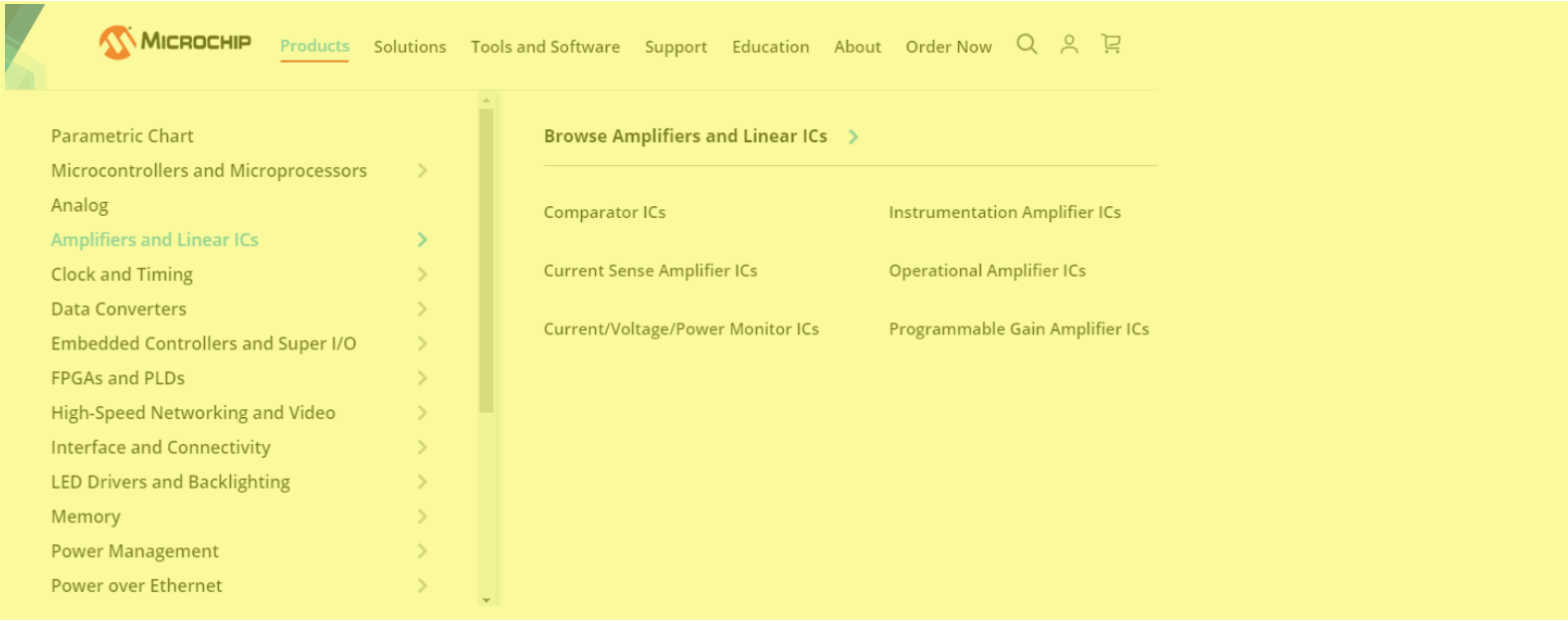
See also:



See https://www.microchip.com/ (last accessed June 8, 2021).

See also https://www.microchip.com/en-us/products/amplifiers-and-linear-ics/comparator-ics (last accessed June 8, 2021) below: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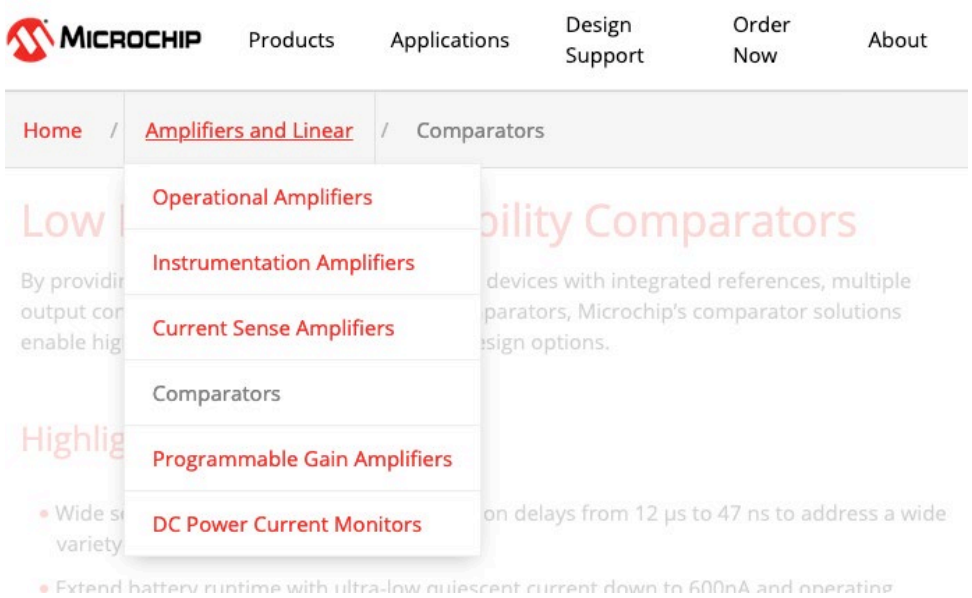
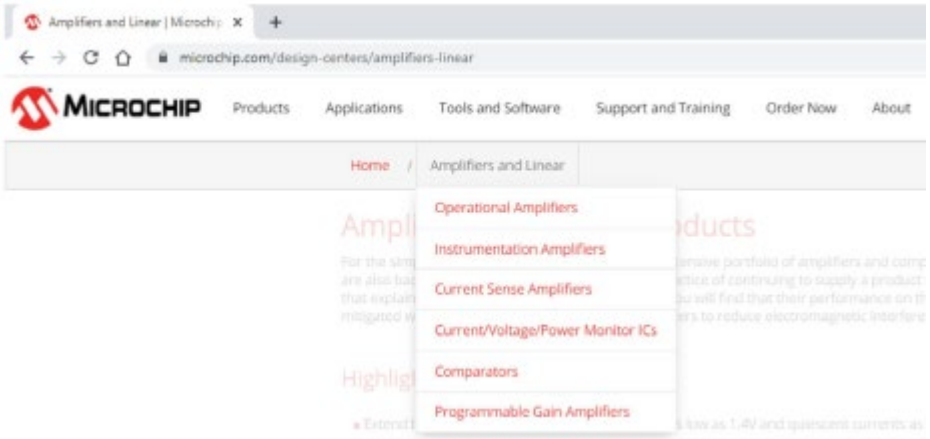
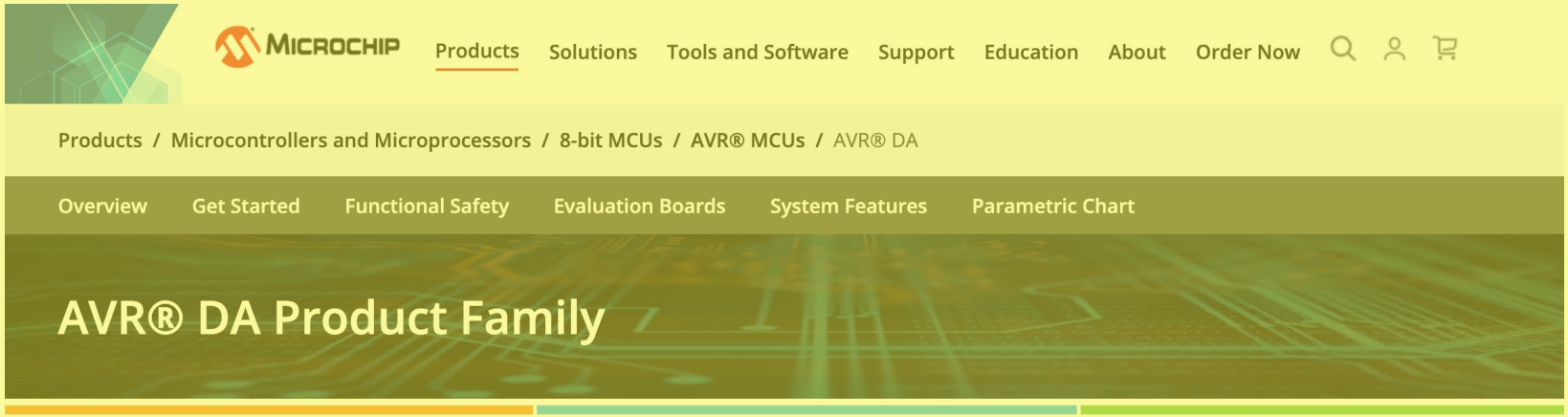
Instrumentation Amplifier ICs
Current Sense Amplifier ICs
Operational Amplifier ICs
Current/Voltage/Power Monitor ICs
Programmable Gain Amplifier ICs

dynamically constructing an Active Path as a sequence of active links as the user navigates the multi-level hierarchical website, wherein each said active link corresponds to a level in the hierarchical structure;	The '836 Accused Instrumentalities dynamically construct an Active Path, which has been construed by this Court (Dkt. 34) as a sequence of links dynamically created as a menu item is navigated, as a sequence of active links as the user navigates the multi-level hierarchical website, wherein each said active link corresponds to a level in the hierarchical structure. For example, the '836 Accused Instrumentalities dynamically construct a sequence of links dynamically created as a menu item is navigated as a sequence of active links as the user navigates the multi-level hierarchical website (*e.g.*, the '836 Accused Instrumentalities dynamically construct a sequence of links dynamically created as a menu item is navigated (*e.g.*, "Amplifiers and Linear—Comparators") as a sequence of active links as the user navigates the multi-level hierarchical website (*e.g.*, as "Amplifiers and Linear" and "Comparators" are selected)), wherein each said active link corresponds to a level in the hierarchical structure, as shown below:  *See, e.g.*, https://www.microchip.com/design-centers/amplifiers-linear/comparators (last visited Feb. 10, 2020). *See also* MCHP-CADDO_0000935:

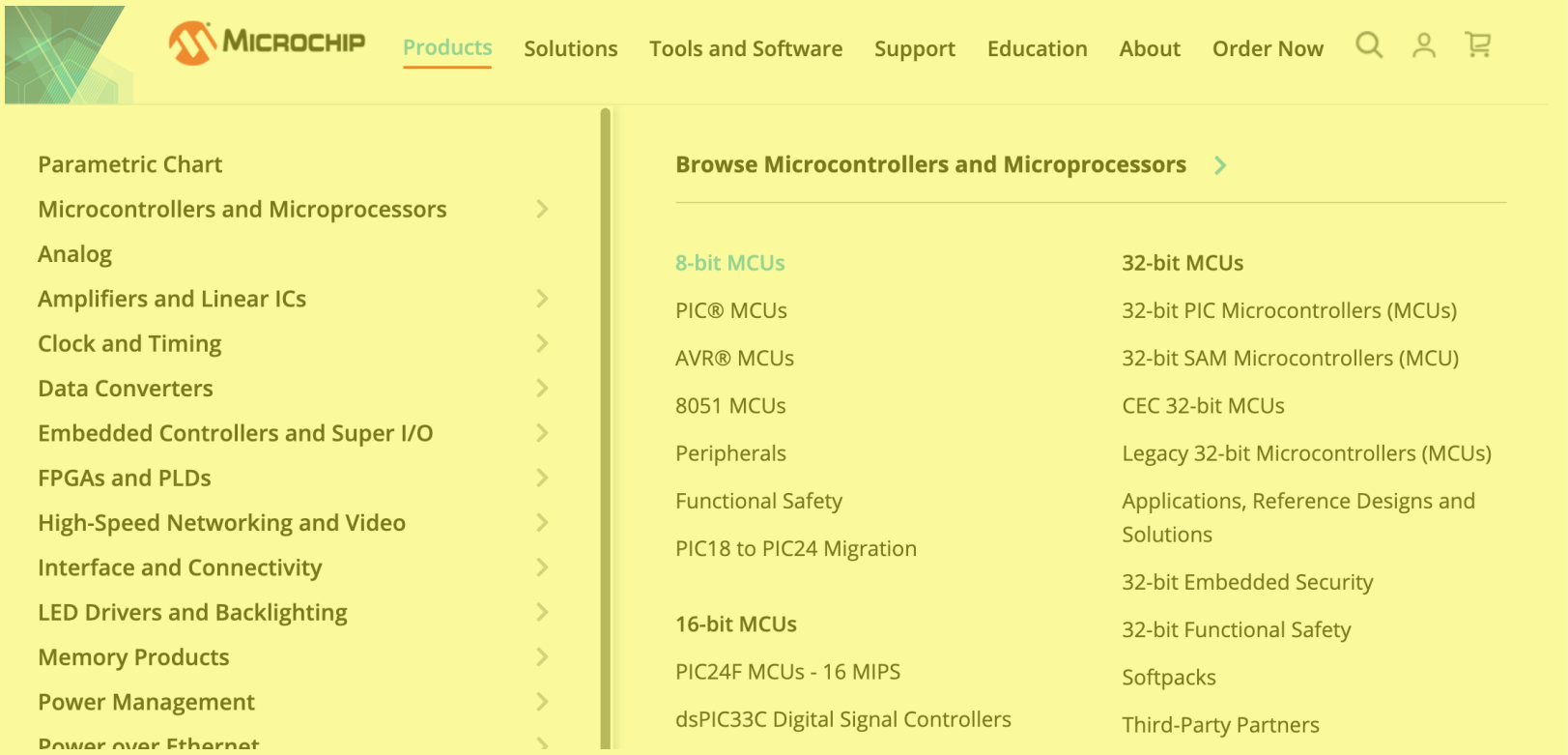


As another example, the '836 Accused Instrumentalities dynamically construct a sequence of links dynamically created as a menu item is navigated as a sequence of active links as the user navigates the multi-level hierarchical website (e.g., the path "Products / Microcontrollers and Microprocessors / 8-bit MCUs / AVR® MCUs / AVR® DA") as a sequence of active links as the user navigates the multi-level hierarchical website (*e.g.*, as "Products," "Microcontrollers and Microprocessors," "8-bit MCUs," "AVR® MCUs" and "AVR® DA" are selected), wherein each said active link corresponds to a level in the hierarchical structure, as shown below:

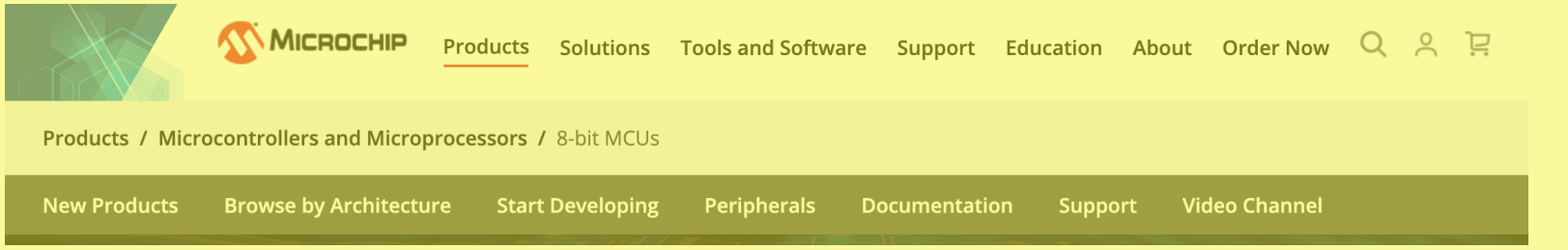


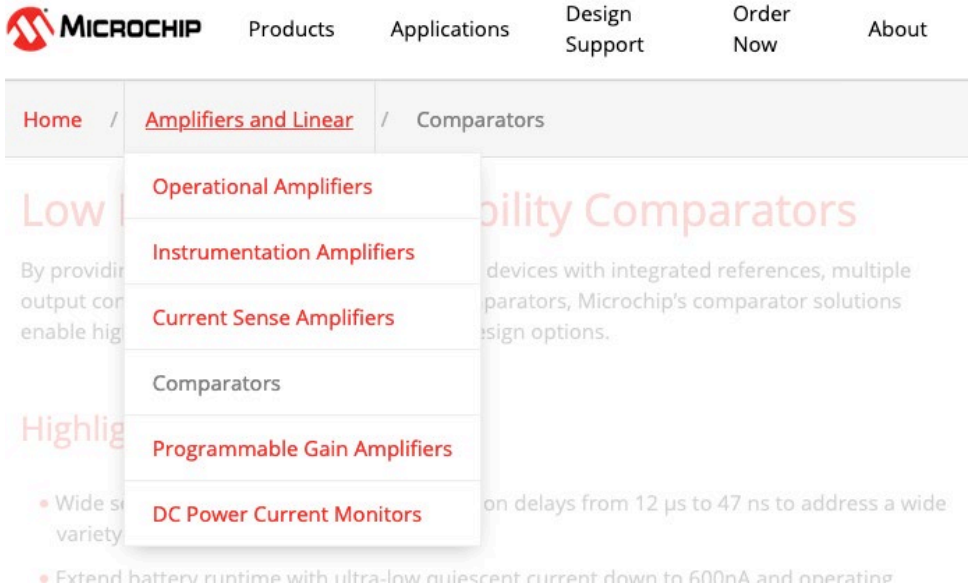
See https://www.microchip.com/en-us/products/microcontrollers-and-microprocessors/8-bit-mcus/avr-mcus/avr-da (last visited Jun. 7, 2021).

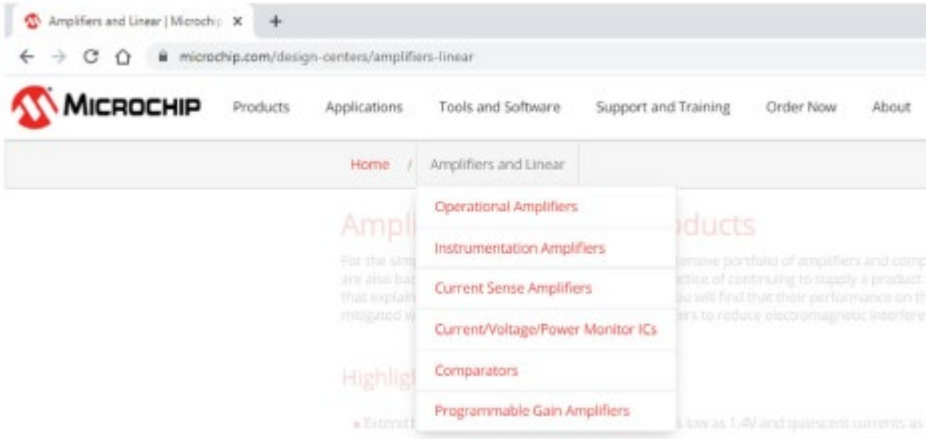
As another example, the '836 Accused Instrumentalities dynamically construct a sequence of links dynamically created as a menu item is navigated as a sequence of active links as the user navigates the multi-level hierarchical website (e.g., the path "Products / Microcontrollers and Microprocessors / 8-bit MCUs") wherein each said active link corresponds to a level in the hierarchical structure (*e.g.*, "Microcontrollers and Microprocessors" corresponds to one level in the hierarchical structure and "8-bit MCUs" corresponds to another level in the hierarchical structure), as shown below:



See https://www.microchip.com/en-us/products/microcontrollers-and-microprocessors/8-bit-mcus (last accessed Jun. 8, 2021); *see also id.*



wherein a user may directly access any given level of the hierarchical structure by selecting a given said active link;	The '836 Accused Instrumentalities allow a user to directly access any given level of the hierarchical structure by selecting a given said active link. For example, the '836 Accused Instrumentalities allow a user to directly access any level of the hierarchical structure by selecting "Amplifiers and Linear," as shown below:  *See, e.g.*, https://www.microchip.com/design-centers/amplifiers-linear/comparators (last visited Feb. 10, 2020). *See also* MCHP-CADDO_0000935: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Amplifiers and Linear
Operational Amplifiers
Instrumentation Amplifiers
Current Sense Amplifiers
Current/Voltage/Power Monitor ICs
Comparators
Programmable Gain Amplifiers

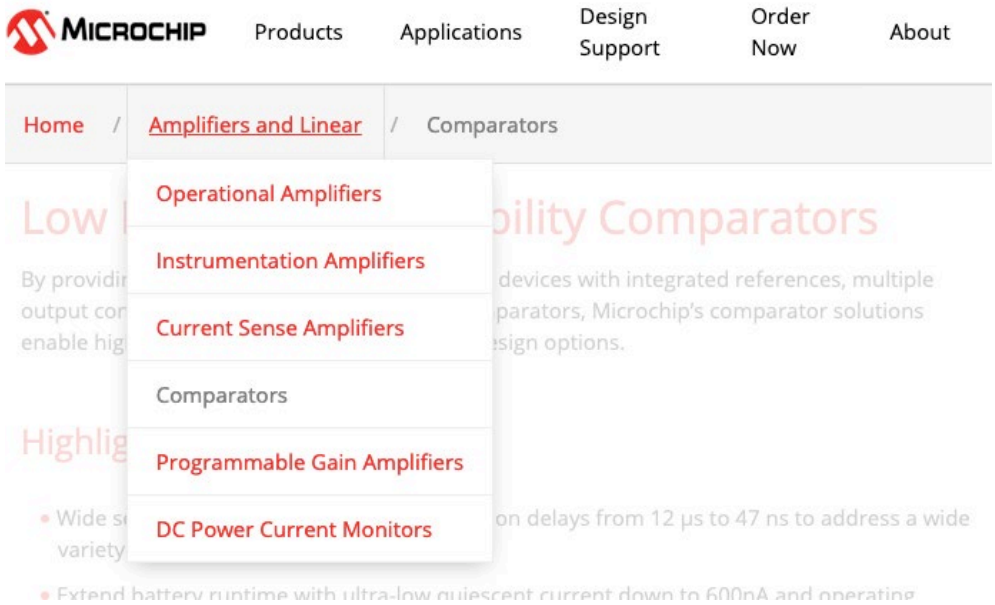
```
<div class="breadcrumbs-open-btn"><span>Menu</span></div>
<div class="breadcrumbs">
    <div class="breadcrumbs-top-bar">
        <span class="breadcrumbs-close-btn">×</span>
    </div>

    <div class="crumbs-wrapper">
        <div class="crumb">
            <div class="crumb-top">
                <a href="/">Home</a>
            </div>
        </div>
        <span class="breadcrumbs-separator">/</span>

                <div class="crumb has-menu">
                    <div class="crumb-top  current">
                        <a href="/design-centers/amplifiers-linear">Amplifiers and Linear</a>
                                <div class="open-menu"><i class="fa fa-angle-down"></i></div>
                    </div>
                     <ul>
    <li class="">
            <a class=" " href="/design-centers/amplifiers-linear/operational-amplifiers">Operational Amplifiers</a>
    </li>
    <li class="">
            <a class=" " href="/design-centers/amplifiers-linear/instrumentation-amplifiers">Instrumentation Amplifiers</a>
    </li>
    <li class="">
            <a class=" " href="/design-centers/amplifiers-linear/current-sense-amplifiers">Current Sense Amplifiers</a>
    </li>
    <li class="">
```

```
349             <a class=" " href="/design-centers/amplifiers-linear/current-voltage-p
    ower-monitors">Current/Voltage/Power Monitor ICs</a>
350         </li>
351         <li class="">
352             <a class=" " href="/design-centers/amplifiers-linear/comparators">Comp
    arators</a>
353         </li>
354         <li class="">
355             <a class=" " href="/design-centers/amplifiers-linear/programmable-gain
    -amplifiers">Programmable Gain Amplifiers</a>
356         </li>
357                         </ul>
358                     </div>
359
360         </div>
361     </div>
362     <div class="breadcrumbs-curtain"></div>
363
364     <div class="row" data-sf-element="Row">
```

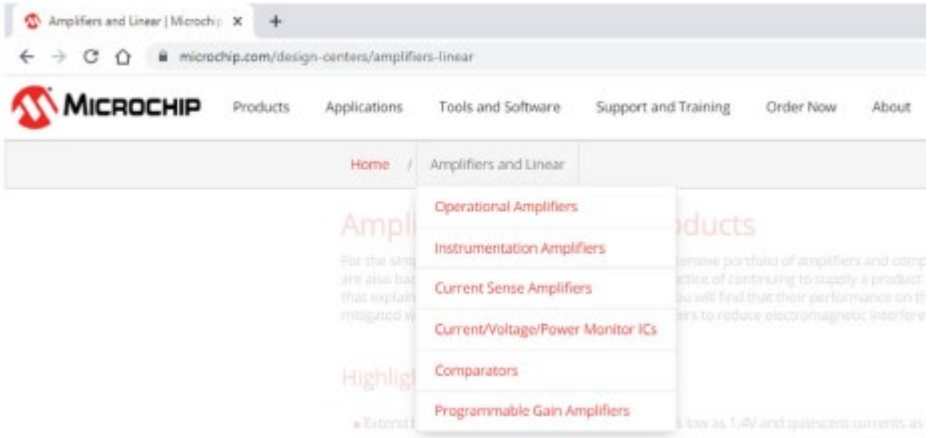
See MCHP-CADDO_0001040-41.

As another example, the '836 Accused Instrumentalities allow a user to directly access any given level of the hierarchical structure by selecting a given said active link (*e.g.*, a user may directly access "Microcontrollers and Microprocessors" in the "Products / Microcontrollers and Microprocessors" or "Products / Microcontrollers and Microprocessors / 8-bit MCUs" to access items such as "Product Categories," "Development Tools," "Software Solutions," "Application Design Centers," and "Product Selections"), as shown below:

See https://www.microchip.com/en-us/products/microcontrollers-and-microprocessors (last accessed Jun. 8, 2021).

each said active link providing the user the ability to directly browse items on any given level of the hierarchical menu structure and hierarchically subordinate items without affecting the Active Path.	Each said active link in the '836 Accused Instrumentalities provides the user the ability to directly browse items on any given level of the hierarchical menu structure and hierarchically subordinate items without affecting the Active Path, which has been construed by this Court (Dkt. 34) as a sequence of links dynamically created as a menu item is navigated. For example, each active link provides the user the ability to directly browse items on any given level of the hierarchical menu structure and hierarchically subordinate items without affecting the sequence of links dynamically created as a menu item is navigated (*e.g.*, the '836 Accused Instrumentalities enable the user to browse items of the hierarchical information structure starting from "Amplifiers and Linear" and items on subordinate levels such as "Operational Amplifiers," "Instrumentation Amplifiers," "Current Sense Amplifiers," "Comparators," "Programmable Gain Amplifiers," and "DC Power Current Monitors" without affecting the sequence of links dynamically created as a menu item is navigated "Amplifiers and Linear—Comparators") as shown below:  *See, e.g.*, https://www.microchip.com/design-centers/amplifiers-linear/comparators (last visited Feb. 10, 2020).

As another example, each active link provides the user the ability to directly browse items on any given level of the hierarchical menu structure and hierarchically subordinate items without affecting the sequence of links dynamically created as a menu item is navigated (*e.g.*, the '836 Accused Instrumentalities enable the user to browse items of the hierarchical information structure starting from "Amplifiers and Linear" and items on subordinate levels such as "Operational Amplifiers," "Instrumentation Amplifiers," "Current Sense Amplifiers," "Comparators," "Programmable Gain Amplifiers," and "Current/Voltage/Power Monitor ICs" without affecting the sequence of links dynamically created as a menu item is navigated "Amplifiers and Linear—Comparators") as shown below:



See MCHP-CADDO_0000935.

As another example, each active link in the '836 Accused Instrumentalities provides the user the ability to directly browse items on any given level of the hierarchical menu structure and hierarchically subordinate items without affecting the sequence of links dynamically created as a menu item is navigated (*e.g.*, the '836 Accused Instrumentalities provide the user the ability to directly browse items (e.g., "Product Categories," "Developments," "Software Solutions," "Application Design Centers," and "Product Selections") in the path "Products / Microcontrollers and Microprocessors" without affecting the a sequence of links dynamically created as a menu item is navigated) as shown below:

See https://www.microchip.com/en-us/products/microcontrollers-and-microprocessors#Product%20Categories (last visited Jun. 7, 2021).

As another example, each active link in the '836 Accused Instrumentalities provides the user the ability to directly browse items on any given level of the hierarchical menu structure (e.g., the level corresponding to "Product Categories" and "Development Tools") and hierarchically subordinate items (e.g., subordinate items associated with "Part Number: DM164136" and "Part Number: DM330028") without affecting the sequence of links dynamically created as a menu item is navigated, as shown below:

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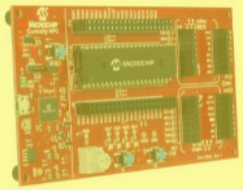
Products / Microcontrollers and Microprocessors

Product Categories Development Tools Software Solutions Application Design Centers Product Selections

Featured Development Tools

Development Board	Description
Curiosity High Pin Count (HPC) Development Board Part Number: DM164136  Learn More	The Curiosity High Pin Count (HPC) Development Board (DM164136) supports a wide variety of 8-bit MCUs. Curiosity Development Boards are cost-effective, fully-integrated MCU development platforms. The development board includes an integrated programmer/debugger and requires no additional hardware to get started.
dsPIC33CH Curiosity Development Board Part Number: DM330028 	Evalute the dual-core dsPIC33CH family using this low-cost board with a configurable power supply load step transient generator. Or customize the board for your application using the two mikroBUS™ interfaces for adding a large variety of click Boards.

	See https://www.microchip.com/en-us/products/microcontrollers-and-microprocessors#Development%20Tools (last accessed Jun. 8, 2021).